# Isle of Dogs Neighbourhood Plan Basic Conditions 2019 - 2031



This draft Basic Conditions Statement for The Isle of Dogs Neighbourhood Plan, which will (once adopted) have effect until 31<sup>st</sup> December 2031, is published following a Regulation 14 public consultation, for submission to Tower Hamlets Council.

Version dated: 26th October 2019

# **CONTENTS & GLOSSARY**

Please see the Neighbourhood Plan document for the full Glossary

## **TABLE OF CONTENTS**

Contents & glossary	2
Introduction	
Basic Conditions and Tests to be Met	3
Legal requirements	4
Having regard to national policies	6
How the plan contributes to Sustainable Development	8
How the plan contributes to Economic Sustainability	9
How the plan contributes to Social Sustainability	10
How the plan contributes to the Environment	10
General Conformity With The Councils Strategic Policies	11
Making of the order does not breach, and is otherwise compatible with, EU obligations	s 15
London Plan 2016 Conformity	16
Equalities Impact Assessment	20

# INTRODUCTION

The following pages set out how the isle of Dogs Neighbourhood Plan proposal fulfils the 'Basic Conditions' of Neighbourhood Planning and other considerations in order to satisfy the requirements set out in legislation and pass the independent examination.

This Basic Conditions Statement explains how the Neighbourhood Plan proposal as a whole and the policies it contains meet each Basic Condition and other legal tests.

The submitted Neighbourhood Plan proposal should also be read in conjunction with the Consultation Statement: this sets out the consultation and engagement with local residents, businesses and interested parties during the plan's preparation

To be 'made', a neighbourhood plan must meet certain Basic Conditions. These include that the making of the plan 'does not breach, and is otherwise compatible with, EU obligations'. These EU obligations include environmental assessments. In order to support the Neighbourhood Forum to meet this requirement, Tower Hamlets Council has undertaken a screening to determine whether the proposed Isle of Dogs Neighbourhood Plan (pre-submission version) should be subject to a Strategic Environmental Assessment (SEA) or Habitats Regulation Assessment (HRA). It has concluded that the draft Isle of Dogs Neighbourhood Basic Plan does not need to be subject to a SEA report or HRA.

## **BASIC CONDITIONS AND TESTS TO BE MET**

Schedule 4B of the Town and Country Planning Act (Para. 8) sets out the following conditions which a Neighbourhood Development Plan is required to meet.

- 8(1) The examiner must consider the following—
- (a)whether the draft neighbourhood development order meets the basic conditions (see subparagraph (2)),
- (b) whether the draft order complies with the provision made by or under sections 61E(2), 61J and 61L,
- (c) whether any period specified under section 61L(2)(b) or (5) is appropriate,
- (d) whether the area for any referendum should extend beyond the neighbourhood area to which the draft order relates, and
- (e) such other matters as may be prescribed.

A draft order meets the basic conditions if—

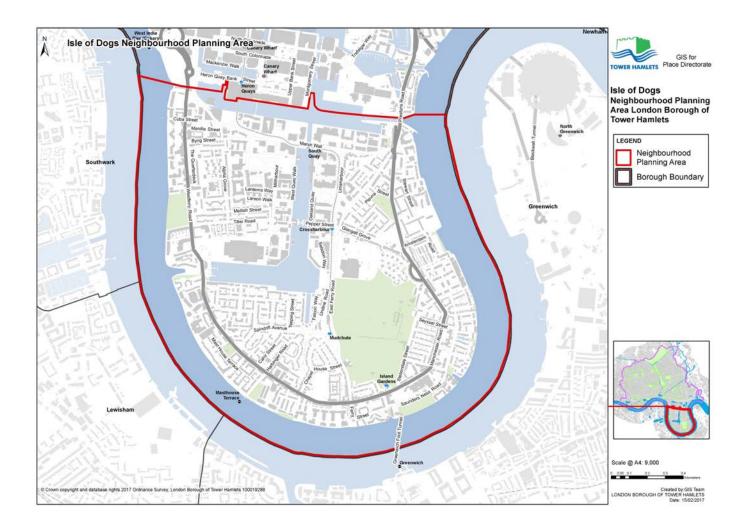
- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- (d) the making of the order contributes to the achievement of sustainable development,
- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- (f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and
- (g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

## **LEGAL REQUIREMENTS**

## The Neighbourhood Plan proposal is being submitted by a qualifying body

The application to designate a Neighbourhood Planning Area and Forum for the Isle of Dogs was approved by the Executive Mayor of Tower Hamlets John Biggs in Cabinet on Tuesday 5 April 2016.

https://www.towerhamlets.gov.uk/lgnl/environment and planning/planning/planning guidance/neigh bourhood\_planning/Isle\_of\_Dogs.aspx



## That is being proposed is a Neighbourhood Development Plan

Although we use the term Neighbourhood Plan, it is the same as a Neighbourhood Development Order. The document contains a vision statement as a guide to what we aspire to achieve but the vision are not Policies.

Policies are separately identified in Blue font with a gray background

The proposed Neighbourhood Plan states the period for which it is to have effect.

The Plan will have effect until the 31st December 2031 in order to align with the new LBTH Local Plan.

The proposed Neighbourhood Plan does not relate to more than one neighbourhood area and there are no other Neighbourhood Development Plans in place within the neighbourhood area.

The plan relates only to the NP Area and there are no other Neighbourhood Plans within the Neighbourhood Area.

However, once the Plan has been submitted to LBTH work will start on;

- A new 'sister' Forum for the areas removed from the Area in April 2016 but which were in the original application submitted on the 1<sup>st</sup> December 2014. This new Forum may wish to adopt parts of this NP given that members of that Forum have been involved in writing this Plan. This is why much of the research in the Backup document refers to a wider area (as well as the difficulty of getting data for the Area imposed on us).
- A replacement Neighbourhood Plan called the 'long' Plan which will replace this NP in time. Given the pace and speed of development we knew that to write a fully detailed NP after the 16-month delay in recognition would mean we miss the opportunity to influence developments underway.

A neighbourhood development order may not provide for the granting of planning permission for any development that is excluded development.

There are no excluded developments relevant to this NP

having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,

This NP Plan does not specifically deal with heritage issues. In the short term, we are satisfied that LBTH policies cover these issues adequately. In the long term, we intend in the 'long' Neighbourhood Plan to address this issue in more detail.

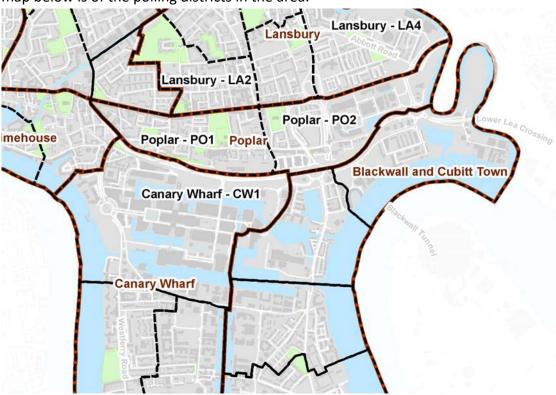
having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,

This NP Plan does not specifically deal with conservation areas. In the short term, we are satisfied that LBTH policies cover these issues adequately. In the long term, we intend in the 'long' Neighbourhood Plan to address this issue in more detail

the making of the order does not breach, and is otherwise compatible with, EU obligations See page 15 whether the area for any referendum should extend beyond the neighbourhood area to which the draft order relates,

The Neighbourhood Area imposed on the 5<sup>th</sup> April 2016 by LBTH cut across ward boundaries, LSOA areas and polling district Canary Wharf 1 in Canary Wharf ward. The original Forum Area applied for on the 1<sup>st</sup> December 2014 did not do so as it was based on ward boundaries and strong physical boundaries.

We would therefore recommend that the whole of polling district Canary Wharf 1 be included in the referendum area. The area was formerly in the Forum Area submitted on the 1<sup>st</sup> December 2014 and we continue to have members in that area who continue to be consulted. We know Democratic Services are concerned about administering the split if the referendum was held on the day of another election. The map below is of the polling districts in the area.



## HAVING REGARD TO NATIONAL POLICIES

The table below shows how our NP policies match sections of the NPPF (February 2019 update)

NPPF Chapter Heading	NPPF Paragraph	Neighbourhood Plan Policies
3. Plan-making	20 b) infrastructure	D1
	20 c) community facilities	D1
	20 d) conservation	AQ1
	28. Non-strategic policies	D1
	34. Plans should set out the	D1
4. Decision-making	39. Early engagement has	RB1, CC1, CC2
	significant potential	

	41. The more issues that can be resolved at preapplication stage, 43. The right information is crucial to good decisionmaking, 52. Communities can use Neighbourhood Development Orders and Community Right	D1, 3D1  3D1  RB1
6. Building a strong, competitive economy	81 c) seek to address potential barriers to investment, such as inadequate infrastructure,	D1
8. Promoting healthy and safe communities	91 c) enable and support healthy lifestyles, 92 a) plan positively for the provision	D1, ES1, AQ1 D1
	93. Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration.	RB1
	94. It is important that a sufficient choice of school places	D1
	96. Access to a network of high quality open spaces	D1, ES1
9. Promoting sustainable transport	102. a) the potential impacts of development 109. Development should only be prevented	D1 D1
11. Making effective use of land	118. promote and support the development of under-utilised land and buildings,	ES1
12. Achieving well-designed places	124. The creation of high quality buildings 129. Local planning authorities should ensure that they have access to,	SD1, 3D1 3D1

	and make appropriate use of, tools	
15. Conserving and enhancing the natural environment		
15. Conserving and enhancing the natural environment	170 e) preventing new and existing development 180. Planning policies and decisions should 181. Planning policies and decisions should sustain	CC3, AQ1 CC3, AQ1 CC3, AQ1

## HOW THE PLAN CONTRIBUTES TO SUSTAINABLE DEVELOPMENT

The Isle of Dogs is a unique place. The Forum area is an island with water on four sides with limited access to the rest of London. It is also part of the most important growth area in the UK and one of the most important economic areas in the UK.

It is possible based on forecasts for the Forum area and other areas in the E14 postcode area that the eventual population will reach around 250,000 people, bigger than many UK cities. Part of this NP is to prepare for that new 'city'. It is likely that the policies in this Plan will be used by neighbouring Planning Forums which are in the process of being set up. (Poplar and Limehouse wards already have Neighbourhood Planning Forums).

But the principles of sustainable development are perhaps more important here than elsewhere in the UK. The original Ministerial Foreword to the first NPPF had this to say;

"Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations."

Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population, which is living longer and wants to make new choices. We must respond to the changes that new technologies offer us. Our lives, and the places in which we live them, can be better, but they will certainly be worse if things stagnate."

These sentiments speak directly to our Neighbourhood Plan. How do we make the densest place in the United Kingdom and probably western Europe a sustainable place to live? How do we ensure sustainable development in the place with the tallest and densest residential developments? How do we ensure sustainable development when our peers are not Bristol, Birmingham or Chelsea but Manhattan, Shanghai and Singapore (whose planning team we have met)?

Sustainable development on the Isle of Dogs will look different to other parts of the country but will still be true to the principles of the NPPF.

## HOW THE PLAN CONTRIBUTES TO ECONOMIC SUSTAINABILITY

an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

The northern part of the Isle of Dogs is part of the Central Activities Zone for London signifying its importance and Canary Wharf is the 3<sup>rd</sup> most important economic area in the UK (Centre for Cities). Residential development on the Isle of Dogs also play an important element of the UK's balance of payments and economy given the sheer scale of developments. The Homes and Communities Agency has lent Canary Wharf Group money to build both Newfoundland and Wood Wharf. We also have nationally important data centres in the Area or nearby. Tower Hamlets has also been the leading recipient of New Homes Bonus every year since the programme's inception in 2012 much of it earned on the island or nearby.

Canary Wharf's economic role cannot work effectively if part of the area and its hinterland to the south cease to function due to a lack of infrastructure. Development cannot proceed if it does not have the supporting infrastructure and given the shortage of publicly owned land in the Area it has to be planned for as part of site allocations or through NP policies.

It should be noted that the site allocations in the new LBTH Local Plan do not produce enough sites for all of the infrastructure assets identified in the OAPF DIFS study.

Policy D1 is about ensuring that there is a supply of infrastructure to support development. That development is not constrained by shortages of infrastructure. That previous policies have led to an oversupply of planned primary schools but an under supply of other social infrastructure. This has resulted in uncertainty over what to do with some of those sites other then to delay their delivery. This is inefficient.

3D1 is about ensuring planning is efficient, we also believe a 3D model would save developers and LBTH money in the long term. Other major economic centres like the City of London, Singapore, New York and Hong Kong all use 3D models in the planning process, so should the Isle of Dogs given its similarity to those places.

SD1 is about ensuring development are built to the highest possible environmental standards which also ensures they are cheaper to heat, run and operate.

## HOW THE PLAN CONTRIBUTES TO SOCIAL SUSTAINABILITY

A social objective — to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

The Isle of Dogs has traditionally been an area where social and other infrastructure lags development. With inadequate social facilities, high cost of living, high levels of anti-social behaviour and continuous construction too many residents choose to leave the area every year despite loving the location and natural settings of the Area. It is not sustainable to lose so many people.

It is also why school place planning is so difficult here.

The Isle of Dogs is also one of the most mixed and diverse communities in the country with people born here as well as from all over the world. We are one of the leading suppliers of new homes in the country and expectations expressed in the OAPF DIFS study will accentuate that.

We are supporting strong, vibrant and healthy communities through the following policies;

D1 – ensures that we have the community and infrastructure we need close by

ES1 – which ensures that no empty land or building is left fallow and unused but is available for community use

RB1 – which ensures that estate regeneration only happens with the consent of those living in buildings due to be demolished

## HOW THE PLAN CONTRIBUTES TO THE ENVIRONMENT

An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Construction related traffic, noise, dust and fumes have a major impact on the Area. It is likely that there will be major construction sites active in the Area throughout the duration of this Plan. Rather than treating construction as a one-off activity it has to be seen as part of our day to day experience of the planning process.

Policies CC1 to CC3 are all about trying to improve the construction process.

In addition, the following policies meet the requirement to plan for the environment

ES1 ensures that sites are not knocked down un necessarily as has happened repeatedly in the local area i.e. McDonalds on Preston's Roundabout, JP Morgan/Riverside South

SD1 ensures that the latest 'Excellent' BREEAM sustainability standards are used for the following issues;

- Energy
- Land use and ecology
- Water
- Health and wellbeing
- Pollution
- Transport
- Materials
- Waste
- Management

AQ1 is about improving air quality in an Area that suffers from poor air quality around construction sites and on its northern boundary especially

## GENERAL CONFORMITY WITH THE COUNCILS STRATEGIC POLICIES

Tower Hamlets Council current Local Plan has two main documents;

- Core Strategy Development Plan Document 2025 adopted September 2010
- Managing Development Document was formally adopted April 2013

https://www.towerhamlets.gov.uk/lgnl/environment\_and\_planning/planning\_guidance/local\_plan.aspx

The replacement Local Plan 2031 has now finished its public examination and is due to be made in early 2020. As a result we have done a table below showing how the NP matches the current Local Plan 2025 and then below that a 2<sup>nd</sup> table showing how it conforms also with the new Local Plan 2031.

Our current NP with its limited number of Policies relies heavily on the Local Plan to fill the gaps. But we have focussed our Policies on those areas not sufficiently covered by the Local Plan so that added together they ensure sustainable development.

	LBTH Strategic Plan Policies – Core Strategy 2025	Neighbourhood Plan Policies
SO1	Excellent regional, national and global connections	D1, ES1, RB1, AQ1
SO2	Benefiting from the Olympic legacy	Not applicable
SO3	Healthy and sustainable environment	D1, AQ1, 3D1, SD1
SO4	Successful town centres	Not applicable
SO5	Active town centre edges and main routes	Not applicable
SO6	Complementary uses to support town centres	Not applicable

SO7	New housing	D1, ES1
SO8	Appropriate types of housing	RB1
SO9	High quality housing	3D1, SD1
SO10	Improved health and well- being of local people	D1, ES1, SD1
SO11	Adequate social infrastructure	D1, ES1
SO12	High quality, well connected green and blue spaces.	ES1
	Improved biodiversity	
SO13	Flooding prevention, mitigation and adaptation	Not applicable
SO14	Sustainable waste management	Not applicable
SO15	Successful global economic centres. Vibrant local economy	All policies
SO16	Successful businesses in appropriate locations	Not applicable
SO17	7 Improved skills of local people. Lower levels of Not applicable	
	worklessness among local people	
SO18	Improved skills of local people. Vibrant local economy	D1
SO19	High quality and accessible sustainable transport network	Not applicable
SO20	Connected and legible streets and spaces	3D1
SO21	High quality public realm	Not applicable
SO22	Protected and enhanced heritage assets	Not applicable
SO23	Well-designed buildings and places. Tall buildings in	3D1, SD1, AQ1
	appropriate locations.	
SO24	Reduction in carbon emissions	SD1, AQ1
SO25	Successful, vibrant, locally distinct and integrated places	All policies

The fact that Tower Hamlets three years after completing the 2<sup>nd</sup> part of its first Local Plan is already rewriting it shows the pressure of development.

The decision to write a Neighbourhood Plan predates the decision to rewrite the Local Plan.

	LBTH Strategic Plan Policies – Local Plan 2031 Managing growth and sharing the benefits	Neighbourhood Plan Policies
S.SG1	Areas of growth and opportunity within Tower Hamlets	D1 Paragraph 1 & 3 emphasises the importance of the Isle of Dogs for delivering new homes, Paragraph 7 summarises the importance of new infrastructure
S.SG2	Delivering sustainable growth in Tower Hamlets	D2, ES1, SD1, AQ1, RB1- we believe our NP supports the sustainable delivery of new homes, so this Policy supports most of our policies
D.SG3	Health impact assessments - Not strategic	Not applicable but the need to deliver a Health Impact Assessment is in principle the same as the need to deliver an Infrastructure Impact Assessment.
D.SG4	Construction of new development - Not strategic	CC1, CC2, CC3. This policy indicates that LBTH are also concerned about the impact of construction. Our policies deal with some of the issues in more detail.
D.SG5	Developer contributions	Not applicable

S.DH1	Delivering high quality design	D2, SD1, 3D1, ES1 – another key policy but again where we believe more detail is required to flesh out the ambitions in this policy.
D.DH2	Attractive streets, spaces and public realm	Not applicable
S.DH3	Heritage and the historic environment	Not applicable
D.DH4	Shaping and managing views	3D1 – given the number of and height of tall buildings in the Area and nearby and how close many of these towers are to other buildings (as close as 16 meters in one case) we believe that only a 3D model properly allows these issues to be considered
S.DH5	World heritage sites	Not applicable
D.DH6	Tall buildings	3D1 – same point as D.DH4 but the ability of 3D models to do micro-climate analysis for example allows the location and shaping of towers do be optimised much earlier in the planning process. Two of five tall building zones are in the Area.
D.DH7	Density	D1, D2, 3D1 – this policy requires the cumulative impact of development to be considered, same as the objective of our Policy D1. A 3D model would allow better planning as the potential for neighbouring sites could be more easily analysed early on.
D.DH8	Amenity - Not strategic	SD1, 3D1, CC3 – sets out to improve the amenity of new homes which is also the objective of our policies SD1. That 3D models will help achieve these objectives and that construction can impact the amenity people feel in their homes
D.DH9	Shopfronts - Not strategic	Not applicable
D.DH10	Advertisements, hoardings and signage - Not strategic	Not applicable
D.DH11	Telecommunications	3D1 – much easier to plan the location of mobile phone masts when you can easily see where new buildings may block signals
S.H1	Meeting housing needs	D1,RB1, SD1 – emphasis the scale of development expected locally. Mixed and balanced communities need policy RB1 to ensure that they remain mixed and balanced. Developments are strongly encouraged to be well-designed, sustainable and can use the Home Quality Mark to demonstrate ths. 'Must take account of cumulative development' i.e. which is what policy D1 requires
D.H2	Affordable Housing	RB1 – estate regeneration schemes are required to provide an uplift in the number of affordable homes which is more easily done if GLA grant funding is available

D.H3	Housing standards and quality	SD1 – D.H3 emphasises the importance of standards which can also be done by showing whether or not the Home Quality Mark standards have been used or not
D.H4	Specialist housing	Not applicable
D.H5	Gypsies and travellers accommodation	Not applicable
D.H6	Student housing	Not applicable
D.H7	Housing with shared facilities ('houses in multiple occupation')	Not applicable
S.EMP1	Creating investment and jobs	Not applicable
D.EMP2	New employment space	Not applicable
D.EMP3	Loss of employment space	Not applicable
D.EMP4	Redevelopment within the borough's employment areas	Not applicable
S.TC1	Supporting the network and hierarchy of centres	Not applicable
D.TC2	Retail in our town centres	Not applicable
D.TC3	Retail outside our town centres	Not applicable
D.TC4	Financial and professional services	Not applicable
D.TC5	Food, drink, entertainment and the night-time economy	Not applicable
D.TC6	Short-stay accommodation	Not applicable
D.TC7	Markets	ES1 – supports the creation of new markets, including farmers markets which are are temporary in nature and bring vacant sites back into use
S.CF1	Supporting community facilities	D1, ES1 – Development should maximise opportunities for the provision of high quality community facilities to serve a wide range of users
D.CF2	Existing community facilities	Not applicable
D.CF3	New and enhanced community facilities	D1, ES1 - This policy seeks to ensure that appropriate high quality community facilities are provided in accessible locations throughout the borough to adequately support the growing population and meet identified needs.
D.CF4	Public houses	Not applicable
S.OWS1	Creating a network of open spaces	D1, ES1 – Promote the creation of new publicly accessible open spaces as do our policies
S.OWS2	Enhancing the network of water spaces	Not applicable
D.OWS3	Open space and green grid networks	D1, ES1 - Strategic development should contribute to the delivery of new publicly accessible open space on-site same as our policies
D.OWS4	Water spaces	Not applicable

S.ES1	Protecting and enhancing our environment	AQ1, SD1 – has the same objectives as our Policy
D.ES2	Air quality	AQ1, SD1 - " "
D.ES3	Urban greening and biodiversity	D1, ES1, AQ1 - Major development is required
		to submit an ecology assessment demonstrating biodiversity enhancements – this
		is very similar in principle to policy D1 requiring
		infrastructure assessments
D.ES4	Flood risk	Not applicable
D.ES5	Sustainable drainage	Not applicable
D.ES6	Sustainable water management	Not applicable
D.ES7	A zero carbon borough	AQ1, SD1 - As a minimum, all self-contained
		residential proposals will be strongly
		encouraged to meet the Home Quality Mark.
		Also requires the use of BREEAM
D.ES8	Contaminated land and storage of hazardous substances	Not applicable
D.ES9	Noise and vibration - Not strategic	Not applicable
D.ES10	Overheating	Not applicable
S.MW1	Managing our waste	Not applicable
D.MW2	New and enhanced waste facilities	Not applicable
D.MW3	Waste collection facilities in new development	Not applicable
S.TR1	Sustainable travel	D1 – 'meet the demands arising
		from future growth'
D.TR2	Impacts on the transport network	D1 - any development that is likely to have a
		significant impact on the transport network will
		be required to submit a transport assessment or
		transport statement as part of the planning
		application. This is very similar in principle to
D TD2	Darking and narmit free	policy D1 requiring infrastructure assessments
D.TR3	Parking and permit-free	Not applicable
D.TR4	Sustainable delivery and servicing	CC1, CC3 – emphasises the importance of
		construction in sustainability

# MAKING OF THE ORDER DOES NOT BREACH, AND IS OTHERWISE COMPATIBLE WITH, EU OBLIGATIONS

To be 'made', a neighbourhood plan must meet certain Basic Conditions. These include that the making of the plan 'does not breach, and is otherwise compatible with, EU obligations'. These EU obligations include environmental assessments. In order to support the Neighbourhood Forum to meet this requirement, the Council has undertaken a screening to determine whether the proposed Isle of Dogs Neighbourhood Plan (pre-submission version) should be subject to a Strategic Environmental Assessment (SEA) or Habitats Regulation Assessment (HRA). It has concluded that the Draft Isle of Dogs Neighbourhood Plan does not need to be subject to a SEA report or HRA.

Further details are provided in the documents available on the Council website here;

https://www.towerhamlets.gov.uk/lgnl/environment and planning/planning/planning guidance/neigh bourhood planning/Isle of Dogs.aspx

## **LONDON PLAN 2016 CONFORMITY**

The Forum believes that its Neighbourhood Plan is in general conformity with the Mayor of London's - London Plan – March 2016 version. The London Plan sets planning policy at a London wide level.

The Area of the Forum is contained within the Isle of Dogs Opportunity Area. The London Plan also sets specific targets for the Opportunity Area of 110,000 extra jobs and a minimum of 10,000 new homes. With 19,500 homes with planning permission in the OAPF area plus many more delivered between the setting of the target and October 2019, this target has been achieved. The new draft London Plan has a target of 29,000 new homes for the Opportunity Area.

The draft London Plan also reduces the overall number of new homes Tower Hamlets has to deliver as outlined in the Evidence Base.

The London Plan recognises the northern part of the Isle of Dogs as part of the Central Activities Zone (CAZ) for London. The London Plan does not define the exact boundaries of the CAZ but the draft LBTH Local Plan 2031 sets them as adjoining our northern boundary so our Area is not subject to the CAZ although that is dependent on the final outcome of the Local Plan 2031.

The following Supplementary Planning Guidance (SPG) in the London Plan are either specifically referred to or directly relevant to the NP:

- Housing Supplementary Planning Guidance May 2016
- The control of dust and emissions during construction and demolition July 2014
- Central Activities Zone March 2016
- Affordable Housing & Viability August 2017

While not an SPG the MD2316 Funding condition to require resident ballots is directly relevant to Policy RB1.

Given the large number of London Plan policies only those which are directly relevant are detailed below.

London Plan Policy	Relevant	Comment on conformity
	Neighbourhood	
	Plan Policy	
POLICY 1.1 DELIVERING THE	D1, SD1, AQ1	The London Plan says this "The
STRATEGIC VISION AND		development of east London will be
OBJECTIVES FOR LONDON		a particular priority to address
		existing need for development,
		regeneration and promotion of
		social and economic convergence
		with other parts of London and as
		the location of the largest
		opportunities for new homes and jobs."
		The NP Area is at the heart of the
		development in East London and our
		NP will help ensure these aspirations
		are delivered.
POLICY 2.9 INNER LONDON	All policies	"B. Within LDFs boroughs with all or
		part of their area falling within inner
		London (see Map 2.2) should
		develop more detailed policies and
		proposals taking into account the
		above principles." The NP helps
		deliver the required detailed policies
		targeted at this unique area.
POLICY 2.13 OPPORTUNITY	All policies	"C. Within LDFs boroughs should
AREAS AND INTENSIFICATION		develop more detailed policies and
AREAS		proposals for opportunity areas and
		intensification areas."
		The NP helps deliver the required
		detailed policies targeted at this
		unique area.
POLICY 3.4 OPTIMISING	D1, D2	Makes clear how high density can be
HOUSING POTENTIAL		delivered sustainably
POLICY 3.5 QUALITY AND	SD1	"A. Housing developments should be
DESIGN OF HOUSING		of the highest quality internally,
DEVELOPMENTS		externally and in relation to their
		context"
POLICY 3.7 LARGE RESIDENTIAL	D1, D2, ES1,	"B coordinate where
DEVELOPMENTS	CC1, CC2	necessary provision of social,
		environmental and other
		infrastructure and create
		neighbourhoods with a distinctive

POLICY 3.8 HOUSING CHOICE	SD1	character, sense of local pride and civic identity in line with Chapter 7. The planning of these areas should take place with the engagement of local communities and other stakeholders."  The London Plan makes clear "Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments."
POLICY 3.9 MIXED AND BALANCED COMMUNITIES	D1, SD1, RB1	Estate Regeneration policies will help ensure balance "Communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment."
POLICY 3.16 PROTECTION AND ENHANCEMENT OF SOCIAL INFRASTRUCTURE	D1, ES1	The NP will deliver the sites and money for new social infrastructure "A. London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population."
POLICY 3.17 HEALTH AND SOCIAL CARE FACILITIES	D1	
POLICY 3.18 EDUCATION FACILITIES	D1	
POLICY 5.3 SUSTAINABLE DESIGN AND CONSTRUCTION	SD1	"A. The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments

		and to adapt to the effects of climate
		change over their lifetime."
DOLLOV 7.4 LIFETIME	All policies	
POLICY 7.1 LIFETIME	All policies	"In their neighbourhoods, people
NEIGHBOURHOODS		should have a good quality
		environment in an active and
		supportive local community based
		on the lifetime neighbourhoods
		principles set out in paragraph 7.4A"
		this is why we wrote a NP for the IoD
POLICY 7.4 LOCAL CHARACTER	3D1	
POLICY 7.6 ARCHITECTURE	3D1	Given height and density of
		development on the IoD we believe
		these requirements in the London
		Plan are best met through the use of
		3D models "A. Architecture should
		make a positive contribution to a
		coherent public realm, streetscape
		and wider cityscape."
POLICY 7.7 LOCATION AND	3D1	3D modelling will allow more
DESIGN OF TALL AND LARGE	301	
		detailed analysis of issues raised in
BUILDINGS		this Policy
		"D.a. Tall buildings should not affect
		their surroundings adversely in
		terms of microclimate, wind
		turbulence, overshadowing, noise,
		reflected glare, aviation, navigation
		and telecommunication
		interference"
POLICY 7.14 IMPROVING AIR	AQ1, CC3	
QUALITY		
POLICY 8.3 COMMUNITY	Recommendat-	By ensuring that CIL is only spent in
INFRASTRUCTURE LEVY	ions	the Area we support this section of
		the London Plan
		"D. The Mayor will work with
		boroughs to ensure that priorities for
		the application of the CIL for
		strategically important infrastructure
		are identified through the LDF
		process, particularly to support
		development of opportunity and
		intensification areas."
		intensineation areas.

## **EQUALITIES IMPACT ASSESSMENT**

The following is an equalities impact assessment of the NP.

## **Summary**

Residents of the Isle of Dogs came together in autumn 2014 to agree to set up a Neighbourhood Planning Forum for the Isle of Dogs. We have communicated with the wider community through a number of different methods including hand delivered letters, local newspapers, social media, attending meetings and word of mouth.

The NP provides a limited range of policies to deal with urgent issues and responds to the wishes of the community as expressed in our Vision statement. It will benefit the whole community but through its emphasis on improved local infrastructure, air quality, estate regeneration and construction management it will benefit those with limited mobility or health issues in particular.

The NP does not explicitly address the needs of racial or religious groups, or transgender, gay or lesbian groups, or inequalities of sex. However, the Vision statement outlines a community where people get on well together. The NP seeks improvements in facilities and services which will benefit all groups equally.

The Isle of Dogs Neighbourhood Planning Forum does not consider that there are any negative equality impacts that arise from the policies contained within the Neighbourhood Plan or that it raises any issues in relation to the Human Rights Act 1998.

#### **Data Sources**

The data is taken from an aggregate of the ward profiles undertaken by LBTH Corporate Research Unit in May 2014 from the 2011 Census data or data in the GLA Ward Atlas based on 2014 Ward Boundaries

## https://data.london.gov.uk/dataset/ward-profiles-and-atlas

The term 'Island' refers to the three Isle of Dogs wards – Island Gardens, Canary Wharf and Blackwall & Cubitt Town not the NP area which since April 2016 does not neatly align with any existing demographic analysis areas. But we believe the demographic consistency of the total of the three island wards is similar to that of the Area and that new developments will accelerate that process.

## **Population**

The Area is the fastest growing place in the UK in the fastest growing Borough, these are our estimates for the Island and the larger OAPF area (the main NP document has more population growth detail)

	2015	Growth	2031	
Source	ONS	NP draft	NP Model	Growth %
Blackwall & Cubitt Town	16,854	28,595	45,449	170%
Canary Wharf	16,576	28,295	44,871	171%
Island Gardens	15,942	964	16,906	6%
Isle of Dogs Total	49,372	57,854	107,226	117%
Poplar	7,458	3,527	10,985	47%
Total OAPF area	56,830	61,381	118,211	108%

## **Age Profile**

The Area is very much a working area with a below average number of young and old people.

This also reflects the fact that the area is not attractive enough for families.

	Aged 0-15	Aged 16-64	Aged 65+
Island wards	15.0%	80.4%	4.5%
Tower Hamlets	20.0%	73.4%	6.6%
London	19.8%	68.8%	11.4%
England and Wales	18.9%	64.1%	17.0%

## Race

	Island wards	Tower Hamlets	London	England and Wales
White British	32.7%	32.8%	47.1%	81.5%
Other White	18.4%	12.4%	12.6%	4.4%
Mixed	4.5%	4.1%	5.0%	2.2%
Asian or Asian British	19.5%	9.1%	15.8%	6.7%
Bangladeshi	15.8%	32.0%	2.7%	0.8%
Black or Black British	6.3%	7.3%	13.3%	3.3%
Other	2.8%	2.3%	3.4%	1.0%

As can be seen the Island is different from the rest of Tower Hamlets. The Other White and Asian or Asian British (excluding Bangladeshi's) categories are much higher than average.

The Forum believes based on meeting new residents in new developments that this trend is likely to increase and that the Area will become more diverse in the future and that individual groups like White British and Bangladeshi will decline in terms of relative size.

## **Religion or Belief**

	Island wards	<b>Tower Hamlets</b>	London	<b>England and Wales</b>
Christian	33%	27%	48%	59%
Buddhist	2%	1%	1%	0%
Hindu	5%	2%	5%	1%
Jewish	0%	1%	2%	0%
Muslim	19%	35%	12%	5%
Sikh	0%	0%	2%	1%
Other religions	0%	0%	1%	0%
No religion	22%	19%	21%	25%
Religion not stated	19%	15%	8%	7%

As can be seen the Island is very different from the rest of Tower Hamlets and the UK. The % for No religion or Not stated at 41% is higher than Tower Hamlets and the rest of the country.

#### Born in the UK versus Born Abroad

Another way of looking at this issue is looking at the numbers born abroad versus those born in the UK, a majority on the island were born abroad reflecting the international nature of the population.

	Born in UK	Not Born in UK
Island wards	49%	51%
Tower Hamlets	57%	43%
London	63%	37%
England and Wales	87%	13%

## Disability

Reflecting the working population of the area the % of disabled is lower than average for TH.

	Island	<b>Tower Hamlets</b>
Day-to-day activities limited a lot	4.6%	6.8%
Day-to-day activities limited a little	4.6%	6.7%

But twenty of our 401 survey respondents said they were disabled

## **Gender Reassignment**

We do not have any demographic information on gender reassignment. However, this group of people are taken to be represented in the NP area.

#### Gender

The 2011 Census shows that the population of Tower Hamlets is 51.5 % men and 48.5 % women - a gender ratio of 106 male residents per 100 female residents.

For the Island, it was 52.6% men and 47.4% women showing an even greater preponderance of males then the average again reflecting the working population of the area – a gender ratio of 111 male residents per 100 female residents.

This is a very clear difference to London and England as a whole.

			Number of men per 100
	Male	Female	women
Island	52.6%	47.4%	111
Tower Hamlets	51.5%	48.5%	106
London	49.3%	50.7%	97
England and Wales	49.2%	50.8%	97

Interestingly both our membership and survey demographic data shows a preponderance of females actively involved in the Forum with 58% of those completing our surveys demographic data being female.

#### **Sexual Orientation**

We do not have any demographic information on sexual orientation. However, this group of people are taken to be represented in the NP area.

The Forum Committee membership in 2016/17 reflects at least two different sexual orientations, heterosexual and homosexual.

## **Marriage and Civil Partnerships**

We have limited data in this area although the % of single person households provides a clue (although many larger households may be sharing and not co-habiting)

The proportion of single households is

Island 37.2%

Tower Hamlets 34.6%

#### **Pregnancy and Maternity**

In two wards the fertility rate is below average which together with the above average number of males suggests that we have less babies born then other areas.

	General Fertility Rate (GFR) (Births per 1,000
	women aged 15-44)
Blackwall and Cubitt Town ward	62
Canary Wharf ward	58
Island Gardens ward	58
Tower Hamlets	61
London	64
England and Wales	62

#### **Socio Economic**

There has been an extremely rapid population growth in the area for the last thirty years. This trend is expected to continue over the next 15 years as new developments complete. As a result of this growth, there is a pressing need to improve the provision of local infrastructure, which can help enhance people's quality of life in the Borough.

## **Contact Details**

Website: <a href="www.isleofdogsforum.org.uk">www.isleofdogsforum.org.uk</a>
Email: <a href="contact@isleofdogsforum.org.uk">contact@isleofdogsforum.org.uk</a>

Twitter: @IsleofDogsForum

Facebook: www.facebook.com/IsleofDogsNeighbourhoodPlanningForum

Telephone: 0300 030 6033

Address: Isle of Dogs Neighbourhood Planning Forum, 17 Ensign House, Admirals Way, Isle of Dogs,

London E14 9XQ

Target Group	Impact	Reasons
Race Ne		The area is already one of the most mixed in London with new people from all over the world coming to live in the Area. Much of the new population is young and of working age. It has a higher proportion of Other White and non-Bangladeshi Asians then other areas reflecting the international mix of the area.
		Evidence from the 2011 Census showed that BME residents were more likely to be in need of social housing and living in overcrowded households. Policy D1 ensures that we will have a full range of social infrastructure locally which will help all groups but especially those suffering from overcrowding as it will provide more alternative places in the short term while continued development will deliver more affordable housing.
Disability		People with disabilities face significant employment barriers, as disabled people are three times more likely to be unemployed than people with no disabilities.  However, spending of CIL locally which Policy D1 will help towards affordable housing, wheelchair access, local employment and enterprise, transport, public realm, public access and environmental sustainability which will benefit all residents and is particularly important for people in this equalities group.  A key section of the 'long' Plan will be to plan for this group better and determine how CIL will be spent on projects which benefit them
Gender	Positive	Due to the working nature of much of the IoD population males make up a larger than average proportion of the population. The NP will make the area a more attractive place to live and to bring up families which should encourage a more balanced demographic mix.
Gender Reassignment	Neutral	There is no data currently available for this group within the area.  The NP policies will not have a direct impact on this group although the provision of medical facilities outlined in Policy D1 locally will be useful for those requiring extra medical care as they transition
Sexual Orientation	Neutrai	There is no data currently available for this group within the area and we did not ask for this level of information when gathering equalities data as we felt it was an inappropriate question for a resident led body to ask.  The Forum Committee membership reflects at least two different sexual orientations, heterosexual and homosexual.  The NP policies will not have a direct impact on this subject.

		Residents in Tower Hamlets profess a wide range of faiths and this is especially so in the NP area.
		Policy D1 will be advantageous for religious groups as it encourages the provision of extra community centres.
Religion or Belief	Positive	Existing local community centres like Alpha Grove are already used as places of prayer or communion by different religious groups
		representing different faiths. New community spaces can be designed to be multi-use and for example include appropriate washing
		facilities and be sound proofed for late night Ramadan prayers. This will improve local peoples access to places where they can practise
		their religion
		The area is younger than average reflecting the working age population of the area as well as the high turnover of residents in some
		areas. It means that age is less of an issue then other areas. However anecdotally we are aware of people downsizing into the new
Age	Neutral	developments so this may change especially if we succeed in making the area more attractive. Policy D1 will help to ensure that the
		funding is available to support an older population. The estate regeneration policies will also ensure that communities stay together and
		that the older residents of the estates are not displaced.
		There is no data currently available for this group within the area.
Marriage and Civil	Positive	The NP policies will not have a direct impact on this group although in the 'long' Neighbourhood Plan we plan to create some
Partnerships.	Positive	destination sites which may one day be appropriate places for civil ceremonies. The use of CIL to make the area more attractive will
		result in a more balanced community and encourage people to stay and form partnerships
		The data suggests that the Area suffers from a below average number of babies born which together with the unbalanced gender mix
Pregnancy and	Positive	suggests we are not an attractive enough area.
Maternity	rositive	The NP policies will not have a direct impact on this group although the provision of extra new medical facilities which Policy D1 will
		encourage will be useful for those requiring medical care locally