

**STATEMENT OF COMMON GROUND**

Between the Roman Road Bow Neighbourhood Forum (the Forum)

and

The London Borough of Tower Hamlets (LBTH)

**Roman Road Bow Neighbourhood Plan (RRBNP)**

**Date: April 2022**

The following matters have been considered in respect of representations by the Independent Examiner, Jill Kingaby, concerning the draft **Roman Road Bow Neighbourhood Plan**:

**General matters**

1. Comment on LBTH Regulation 16 response, paragraphs 7-12
2. Fig 2, page 12; request to prepare a revised map which names some of the important features e.g. Roman Road, Victoria Park, Mile End Park, A12 highway, so that the location can more easily be identified
3. Page 14, Fig.4 is difficult to read

**Specific comments****1. High street and local economy**

- A. Need to define the uses referred to in paragraph 16 of LBTH response
- B. Need to clarify the town centre hierarchy in the plan area.
- C. The Roman Road Market

**2. Green streets that encourage walking and cycling**

- A. Comment on paragraphs 26-29 of Tower Hamlets Regulation 16 consultation response
- B. The area's context in terms of transport infrastructure and the position of Bow within London's transport network
- C. Type of developments policy GS1 applies to concerning provision for pedestrians and cyclists
- D. Reference in policy GS1 to Mayor of London's strategic policies
- E. TfL comments on School Streets and conversion of on- and off-street parking
- F. Conflict of interest between pedestrians and cyclists, canal towpath widening and the opening up Polydamas Close

**3. Beautiful public spaces**

- A. Address all the points raised in LBTH paragraphs 30-33, in particular the accuracy and legibility of Figures 21 and 22, and whether or not all the proposed Local Green Spaces meet the criterion for designation of being demonstrably special
- B. Proposed modifications to Policies PS1 and PS2 and the Canal and River Trust's suggestion that green spaces for improvement should include Mile End Park

#### 4. New life for our local heritage

A. Paragraphs 34 to 38 of Tower Hamlets' Regulation 16 response include comments on this Objective

#### 5. High quality affordable housing

A. Paragraphs 39 and 40 of Tower Hamlets' Regulation 16 response seek more information and modification to Policies H1 and H2

#### 6: Resilient and Well-Networked Community Infrastructure

A. Policy CF1, Actions CF2-6, Priorities for Community Infrastructure Levy (CIL) funding and supporting text form chapters 9 and 10. Paragraphs 42 – 48 of Tower Hamlets' Regulation 16 response set out some queries and suggestions for modification.

#### **Other matters**

Comments by Thames Water and Marine Planning and Marine Licencing

**Note: Proposed changes to the text of the plan are shown in pink.**

### **Agreed Actions**

#### **General matters**

##### **1. Comment on LBTH Regulation 16 response paragraphs 7-12**

a. Paragraphs 7-8. More detail has been added to the policies and actions referred to, and greater clarity provided over planning obligations where requested. Changes are shown below in the relevant section of the plan (Policy LE1, Action HE3, Policy H2, Action CF2).

b. We will update all references to 'London Plan 2020' to 'London plan 2021.'

c. We will correct formatting errors but introducing footnotes would involve a lot of re-formatting, and we would prefer to stick with endnotes.

d. We will ensure the table of contents and page numbers correspond once all the changes to the plan content have been made.

e. Bullet points to be added in various places as indicated in our response to comment 12 by LBTH in our spreadsheet of responses to the Regulation 16 consultation:

Page 16: at the start of each paragraph in sections 2.2.1 and 2.2.2 about Bow West and Bow East areas.

Page 33, policy LE1: add bullet point at start of policy and before 'Such proposals...'

Page 60, policy HE1: add bullet points before: 'Development proposals at Bow Wharf...'; 'proposed developments must...'; 'Developers are advised...'; 'Recreational provision...'

Pages 74-75 Policy H3 Low carbon housing: add bullet points before: 'proposals for significant...'; 'This includes the....'

Page 77 Policy CF1, add bullet points before: 'In order to meet...' 'Planning applications that propose....' 'New residential developments..' 'Proposals to improve...' 'Where appropriate....'

Page 84 Action CF5, add bullet points before: 'In order for...' 'As a separate matter....'

## 2. Fig 2, page 12

a. Steven Heywood, LBTH, has kindly provided a new boundary map with major roads and parks labelled. <https://drive.google.com/file/d/1SX7nW7WTD7ON5G-gzWAdIV0nYqKt3Vlo/view?usp=sharing> **3. Page 14, Fig.4 is difficult to read**

A clearer copy of the map below will be provided: <https://romanroadlondon.com/wp-content/uploads/2015/01/housing-development-east-london-bow-map1.jpg>

### Specific comments

#### **A. Need to define the uses referred to in paragraph 16 of LBTH response.**

Paragraph 16. We have defined more closely where this policy will apply. The recent development of Mainyard Studios in Bow Road is a good example of the type of development we would like to encourage.

Proposed change to plan: Page 33; add at the bottom of the Key Issue a new paragraph:

In the following policy we define different spaces and activities as follows:

- Maker space: location where people gather to co-create, share resources and knowledge, work on projects, network, and build; includes Class E(g) uses.
- Cultural activity: an activity which embodies or conveys cultural expression, irrespective of its commercial value; includes theatres, cinemas, Class F1(b) uses and some Class E(a) uses where the focus of the business is on cultural expression, e.g. a commercial art gallery.
- Social enterprise: a business which combines a social purpose with financial goals.
- Leisure activity: An activity chosen for pleasure, relaxation, or other emotional satisfaction; may include sports facilities, dance and other exercise studios, community meeting spaces.

#### **B. Need to clarify the town centre hierarchy in the plan area.**

Paragraph 17. The supporting text to Objective 1 now clarifies the town centre hierarchy for the borough, and a new map provided by Steven Heywood shows the town centre hierarchy.

<https://drive.google.com/file/d/1g9YhV5t0NPcG7NhLzQH15lu4VYcb2GE8/view?usp=sharing>

Proposed change to plan: Page 34, **Policy S.TC1, Supporting the network and hierarchy of centres**, add the following at the start of the paragraph:

The plan area contains the Roman Road East District Centre, the Mile End Neighbourhood Centre, and the Bow Road Neighbourhood Parade.

#### **C. The Roman Road Market**

Page 34, A new paragraph added concerning the Roman Road Market after **Tower Hamlets Local Plan 2031**, and before **Planning Obligations: SPD March 2021**. Reference is now made to **Policy**

**D.TC7 Markets**, the **Roman Road Market Action Plan** and local groups concerned with the market and local economy.

### **Roman Road Market**

The market has struggled in recent years to adapt to the changing composition and shopping habits of the local community. Local Plan **Policy D.TC7 Markets** (page 126) requires development proposals impacting existing markets to improve the overall quality of the market and the public realm.

The **Roman Road Market Action Plan** emphasises that 'It will be important to ensure that market improvements do not price the traditional traders out.' The Council will need to work closely with traders to support and manage future changes such as public realm improvements and pedestrianisation in order to revitalise the market and attract new customers. There is no longer a bank or building society in the market, and a larger post office is urgently needed. Partnership work with the **Roman Road Trust**, **Roman Road London** and the **Neighbourhood Forum** will be important during this period of change.

## **2. Green streets that encourage walking and cycling**

### **A. Comment on paragraphs 26-29 of Tower Hamlets Regulation 16 consultation response**

A sentence about principal sources of funding has been added to the 'key issue' paragraph on page 40. Please see below for the new text.

Clause 2. Sentence added to the key issue paragraph 5.2.1 stating reason for the reference to 5 particular roads.

Clause 5 bicycle storage. We think it better not to repeat guidance in the Central Area Good Growth SPD.

Clause 7. Amended to make pedestrian provision the expected standard and to refer to green grid routes.

Clause 8 Specific locations for safer crossings have been added.

Accessibility clause: text added about street clutter.

We agree to use letters rather than numbers for individual clauses.

Proposed text.

#### **Page 40 5.1 Summary of current issues.**

People are discouraged from walking and cycling in the area because most routes are along busy main roads that are dangerous, and with high levels of air pollution. **This is why specific roads are mentioned in the policy. It is likely that more people would walk and cycle if motor traffic volumes and speeds were reduced on main roads, and improved, continuous walking and cycling infrastructure installed.**

It is envisaged that central government, Transport for London and Community Infrastructure Levy (CIL) will be the principal sources of funding for improvements across the plan area, together with direct developer S106 or S278 contributions for specific developments.

Street clutter, such as the night-sky podiums in Gladstone Place, and local directions signs which can be easily turned around, are a hindrance.

### **Policy GS1: Improving safe cycleways**

**1. Safer walking and cycling** Development is required to enhance the pedestrian and cyclist experience with high-quality, dedicated infrastructure on busy main roads, and by improving

pavements, cycleways, cycle storage, access through public spaces, and wayfinding away from busy main roads and in support of School Streets. This shall be achieved by (clauses a-i)....

Reworded clause 7: 7. Other features associated with pedestrian access to the development, including seating for pedestrians and signage, particularly on Green Grid routes.

Reworded clause 8: 8. The provision of safe road crossings where needed, including at the junctions of the A12/Wick Lane/Tredegar Road, Fairfield Road and Tredegar Road, St. Stephen's Road and Roman Road and at Tom Thumb's Arch. A new zebra crossing is needed in Malmesbury Road.

Add the following to policy GS1 after point 9: This will involve joint working with Newham, and with the LLDC until approximately 2025 when planning authority for the areas currently administered by the LLDC are expected to be returned to the boroughs.

After updating text, we will change numbered points 1-9 with letters a - i.

Page 40 Fig 16. If possible, we will add a dotted blue line for new cycle intervention along St Stephen's Road (linking Old Ford Road and Tredegar Road.)

Action GS2 to improve safe walking and cycling. The action is different from the policy in that here we share our priorities for improvements in specific locations across the plan area. On page 48, section 5.3.2, we cite the work of UCL Masters Spatial Planning students as evidence justifying our choice of locations.

We agree clause 2 B in **Action GS2, Making streets safer for children**, is too close to clause 6 of Policy GSI and we will delete this.

## **B. The area's context in terms of transport infrastructure and the position of Bow within London's transport network**

We propose adding the following text to address these points on (page 40) to the start of paragraph **5.1 Summary of current issues:** Bow is generally well served by public transport, with Mile End in the south of the plan area being a major tube and bus interchange. The Bow Road District Line and Bow Church DLR stations are also on the southern boundary of the area. The Tower Hamlets Local Plan (p.186) acknowledges congestion and overcrowding of the transport network and the need for further investment. The plan area's proximity to Central London and Docklands means high volumes of vehicles pass through it daily. The area is bounded on three sides by major traffic routes - Grove Road (A1205) and the Blackwall Tunnel Road (A12) run north-south, and Bow Road (A11) runs east-west. The TfL funded [Liveable Streets Bow](#) research found over 33,000 daily journeys were made within Bow. Of these, 49% were vehicles travelling through the area and not stopping. This means over 16,000 journeys were from non-residents, contributing to air pollution on streets, outside schools and around local shops. The Liveable Streets Bow programme is seeking to reduce commuter traffic and improve infrastructure for cyclists and walkers, whilst at the same time ensuring that the market and local businesses along the Roman Road can continue to receive deliveries conveniently and are well serviced.

## **C. Type of developments policy GS1 applies to concerning provision for pedestrians and cyclists Policy amended to limit contributions to major developments.**

Page 40, 5.2.2 Policy GS1: Improving safe walking and cycling routes; replace 'Development is required' with **Major development as defined in the Council's Full & Outline Planning Applications Checklist is required.....**

**D. Reference in policy GS1 to Mayor of London's strategic policies**

Page 41, section 5.2.3 refers to the Mayor's transport strategy, and we want to avoid making supporting text even longer.

**E. TfL comments on School Streets and conversion of on- and off-street parking** Page 47 Action GS2  
Add points d and e.

d. The expansion of cycle hire where this is needed to meet increased demand.

e. The conversion of general off-street and on-street parking to more beneficial use to create pleasant, safe, attractive and less polluted spaces, particularly for the most vulnerable, where this would not have a detrimental impact on the highway network.

Replace the start of section **5.3.1 Conformity with other policies** with: The action is consistent with the following policies: The **Mayor of London's Transport Strategy March 2018, Tower Hamlets - A Cycling Borough**, chapter 2, paragraph 2.1 and the **London Streetspace Plan 2020** to reduce through traffic on residential streets and enable more people to walk and cycle safely as part of their daily routine; the **Tower Hamlets Council High Density Living Supplementary Planning Document**; Design guideline AB.5

**F. Conflict of interest between pedestrians and cyclists, canal towpath widening and the opening up Polydamas Close.**

Cyclist and pedestrians: we acknowledge that their needs sometimes conflict, particularly along canal towpaths. We have amended Policy GS1 with more detail about pedestrian provision. (Please see revised text above). We also propose adding a clause to GS2 to consider towpath widening.

We raised the suggestion about linking Polydamas Close and Four Seasons Green with LBTH in relation to the proposed development at adjacent Caxton Grove. The LBTH Regeneration Team, who are working on the Caxton Grove development, responded saying the suggestion is not feasible because:

1. There is a long, wide ditch between the gated private development of Polydamas Close and the Caxton Hall site, perhaps owned by Network

Rail.

2. Providing a bridge/link over the trench would then lead to a dead end for Malmesbury Estate residents aiming for Fairfield Road for permeability, as Polydamas Close is a private gated development.

Page 46. Add a point to Action GS2, Improving safe walking and cycling routes: **f. Improve towpaths, including consideration of widening, especially in areas of high use such as Mile End Park.**

**3. Beautiful public spaces****A. Designating local green spaces**

Regarding Figures 21 and 22. The Forum believes these to be accurate, with the exception of the errors referred to below. The Forum acknowledges the legibility of Figure 21 is not very good and will try and improve this.

Fig. 21 The second no. 9 to the East of the other one should be no. 10. The Forum distinguishes between 1) improvements for recreation and play, and 2) parklets and similar environmental measures and wanted to avoid being over-prescriptive, as what is appropriate will be place specific

Figure 22 to be re-named 'Open Spaces in Plan Area' with a key showing , 'Spaces listed in Tower Hamlets' Parks and Open Space Strategy 2017-27' in existing colour and 'Proposed Local Green Spaces' in a different colour.

The numbers on the photos of the proposed green spaces to match the colour of the map key.

Page 51, Figure 51: Change the no. 9 on the east side to no. 10

## **B. Proposed modifications to Policies PS1 and PS2 and question over the inclusion of Mile End Park as a green space for improvement**

Page 50, Policy PS1 To clarify that public realm improvements will be supported in other locations, insert the word '**including**' before 'housing estates' and also after 'similar environmental measures'. Regarding the suggestion for Policy PS2 of including 'Major housing developments located within 200m of the boundaries of each green space will be required to provide contributions to maintain and enhance the space' (if this is not already covered by LBTH Local Plan policies) , we believe the point is covered by Local Plan policies - Local Plan policy S.OWS1 Creating a network of open spaces states: 1. Proposals will be required to provide or contribute to the delivery of an improved accessible, well-connected and sustainable network of open spaces through:

- protecting all existing open space to ensure that there is no net loss (except where it meets the criteria set out in Policy D.OWS3)
- maintaining the open character of Metropolitan Open Land (MOL)
- improving the quality, value, and accessibility of existing publicly accessible open space across the borough and neighbouring boroughs, in line with the Green Grid Strategy, Open Space Strategy, Local Biodiversity Action Plan and Sport England's Active Design Guidance.

## **4. New life for our local heritage**

### **A. LBTH paragraphs 34-38.**

Paragraphs 34-38.

35. List of pubs in Figure 24.

Page 62; Fig 24 shows 3 categories of pubs: nationally and locally listed and those it is proposed to add to the local list.

36. Pubs in conservation areas:

The study 'Pubs in Tower Hamlets' showed 161 pubs (58.1%) in the borough closed between 2000-2017. The pandemic has proved another major challenge for our local pubs, and our public engagement showed there is strong support for this policy giving an added measure of protection to the remaining pubs.

37. HE3 wording.

Gastro pub: a pub that focuses on not only good beer, but high quality food e.g. Morgan Arms, Green Goose "A micropub is a small freehouse which listens to its customers, mainly serves cask ales, promotes conversation, shuns all forms of electronic entertainment. E.g. The King's Arms, Buckfast St. E2; Tap Room: ' A pub where beer is served from taps, and other drinks and sometimes

food are sold, e.g. Mother Kelly's, a New York inspired bar in Bethnal Green; Tank bar: Where beer is fresh through being served from tanks directly into glasses, e.g. Howling Hops in E9.

We propose adding examples to the action HE3 of the different types of pubs which we would support. Page 66. Add to Action HE3 the following sentence at the end of the action:

**Action HE3: Opportunities for new types of Public House**

Tower Hamlets Council to facilitate new models of pubs coming forward and broaden the locations in which proposals might be acceptable.

New models of pubs including gastro pubs serving good quality beer and food, micro pubs in small settings where cask ales are served and conversation promoted, craft beer pubs championing ales from smaller British brewers, tap rooms where beer is served from taps, and tank bars serving beer directly from specialised tanks will be supported in district and neighbourhood centres, neighbourhood parades and other locations where serious detriment to residents can be avoided.

**HE1 Bow Wharf and conformity with local plan**

We believe the policy for Bow Wharf is consistent with Local Plan, which includes: '**Policy D.EMP2 New employment space**

1. New or intensified employment floorspace will be supported within designated employment locations, the Tower Hamlets Activity Areas and identified site allocations.
  2. Outside of the locations cited in Part 1, new employment space will be directed to town centres and accessible locations along major transport routes transport routes.'
- Outside these areas new employment floorspace will be supported in other places if 'the employment use would contribute towards integrated place making.'

The **Local Plan** section on '**Enhancing Open Spaces and Water Spaces**' notes the significant water loss in the borough and says: 13.7 'Hence, it is important that policies protect our valuable water spaces from permanent infillings and oversailing and seek to improve their continuous public access; enhance biodiversity; promote water related and water-dependent recreation; and ensure the delivery of high quality design to celebrate the heritage of our waterways.' (page135) **Local Plan Policy D.OWS4 Water Spaces** is relevant here. it includes developments are required to demonstrate: 'b. there are no adverse impacts on the existing water spaces network, including navigation, biodiversity, water quality, visual amenity, character and heritage value of the water space, taking into consideration the adjacent land and the amenity of existing surrounding developments.'

Reword final paragraph of Policy HE1 to say:

Development proposals must provide for an appropriate mix of uses that include leisure and recreational activities and, where workspaces are provided as part of redevelopment, affordable workspaces for small businesses should be provided in line with the Local Plan. Recreational provision that improves connectivity with the Green Grid and better links Victoria and Mile End Parks and/or Hackney Village with the Roman Road, will be strongly supported.

**The map of conservation areas on Page 59 difficult to read.**

A new map of conservation areas has been provided by LBTH:

<https://drive.google.com/file/d/1s327luLrtA2rYRu1nX4XS1h3vk2tf8I7/view?usp=sharing>

**5. High quality affordable housing**



#### 40. Policy H2, community led housing.

Community led housing is where: Open and meaningful community participation and consent takes place throughout the process. The community group or organisation owns, manages or stewards the homes in whichever way they decide to. The housing development is of true benefit for the local community, a specific group of people (an intentional community), or both. These benefits should also be legally protected in perpetuity.

Page 73 Add at the start of policy H2 Community-led Housing the following bullet points: **Community led housing is where:**

- Open and meaningful community participation and consent takes place throughout the process.
- The community group or organisation owns, manages or stewards the homes in whichever way they decide to.
- The housing development meets the specific needs of the local community, a specific group of people (an intentional community), or both. These benefits should also be legally protected in perpetuity.

### **6: Resilient and Well-Networked Community Infrastructure**

#### 42. Policy CF1 New and improved sports and play facilities.

There is very little legacy within Bow from the 2012 Olympic Games, and existing policy has not led to significant improvements in sports and play provision. Youth work funding across the borough has recently been cut. We have included 5 specific locations where we believe small-scale new or improved sports and play facilities would be appropriate.

Page 77, Add the following text to Policy CF1 after 'will be strongly supported.'

**New or improved play provision will be supported at:**

- Lawrence Close E3 2AS
- Heylyn Square E32DW
- Rectangular paved area with hedges at foot of Wilmer House, Daling Way E3 5NW
- Tarmac square outside Forth House E3 2HQ
- Sutherland Road E3 5HG

#### 43. Action CF2: Concerns around the need for clarity about how improvements will be provided.

Page 78, reworded Action

CF2:

##### **Action CF2 Youth work facilities**

- Proposals will be supported from site owners to develop new or improved youth work, arts or cultural facilities funded by voluntary sector capital grants, local authority estate regeneration or through other capital programmes at the following locations: the Chisenhale Art Place, Malmesbury Estate and Lockton Estate.
- Proposals to improve existing youth facilities at Eastside, Green Light Youth Club and St Paul's Old Ford will be strongly supported.

#### 44. Action CF3 Improving existing community centres

Page 80 Action CF3; Delete the words '**should be allocated**' in the last sentence (typo).

#### 45. Action CF4 Community groups.

Rename CF4 '**Partnership working**' Replace the text for the action with:

- Closer collaboration between the Council and voluntary and community groups will enable better use of limited resources and direct future funding for community infrastructure where it is most needed, considering the range of activities and facilities across the neighbourhood area.
- The Neighbourhood Forum working in partnership with Tower Hamlets Council, other local groups, and Tower Hamlets Council for Voluntary Service will seek to develop community provision where most needed across the neighbourhood area.

#### 46. Action CF5 : Community Asset Transfer and Assets of Community Value

Page 84. Action CF5. The Forum agrees that the wording can be improved, and changes are proposed to clarify why Bow Arts Studio and Nunnery Gallery are mentioned. The reason for mentioning them is that their buildings have been developed and are comparatively well maintained partly because these organisations own them and have the freedom to develop and manage them in a way which isn't possible under a local authority lease. It is [government policy](#) to dispose of surplus and under-used land and property owned by central government wherever possible: 'The disposal of surplus government owned property is an important part of the Government's drive to improve its estate management and create an efficient, fit-for-purpose and sustainable estate that meets future needs.'

The Council's Asset Management Team have stated they do not support the proposal for a transfer of the site, but, to our knowledge, the Council has no long-term strategy or plans to develop the site. A significant part of the site has remained dilapidated and under-used for decades, and the Council understandably has many other pressing demands on its resources at this time. The Asset Management Team's view may not be shared by the Council's elected representatives, and the idea of community asset transfer is supported by the GLA Culture and Creative Industries Unit. Some local authorities, such as [Dartford](#), have developed disposal of land policies which set out criteria for surplus land/property which include that 'it makes no contribution to the delivery of the Council's services, strategic or corporate objectives.' The Council's [Property Procedures for Disposals and Lettings 2019](#) has procedures for disposal that rely on the Asset Management Working Group identifying buildings that they view as unused, under used or not offering value for money. Financial considerations seem to take precedence over wider economic, social or environmental considerations, as regarding the method of disposal, the document states: 'The general presumption is that the method of sale should require the open invitation of competitive bids unless the Divisional Director and HAM considers that an alternative method of disposal would be more appropriate.' From the Forum's perspective, it is hard to understand how retaining the land contributes to Tower Hamlets Council's services, strategic or corporate objectives, other than it provides a regular revenue stream.

**Page 84** Add the following to the end of section 9.6.1 Key issue: **The example of Bow Arts Trust is relevant. They have developed the Nunnery Gallery, a free public gallery with a local focus, alongside a shop and cafe, and plan to purchase the leasehold of 'affordable space' of a large new commercial development in Hackney Wick for long term cultural use. This demonstrates what can be achieved by locally based charities.**

#### **Change to wording of CF5**

**In order for Chisenhale Art Place Trust, Gallery and Dance Space to continue sustainably and control adaptation and development of existing facilities more directly, the Forum would strongly support**

the transfer of ownership of the building from Tower Hamlets Council, using Community Asset Transfer.

Page 84, Action CF5 Label the first paragraph about community asset transfer a. and the second paragraph about Assets of Community Value b.

48. CIL; incorrect name and need to give greater prominence to this section.

Page 87, replace '10 Priorities for Community Interest levy (CIL) funding with:  
**10. Priorities for Community Infrastructure Levy (CIL) or its replacement.**

Move section 10, Community Infrastructure Levy to a separate page and make the heading more prominent

## Other Matters

### 1. Thames Water and Marine Planning and Marine Licencing

Page 71 of draft plan mentions Thames Water's response to the Reg 14 consultation and includes their comment that: 'Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network if no/low water pressure and internal/external sewage flooding of property is to be avoided. Thames Water encourages developers to use their free pre-planning service.' We believe, in the context of the plan, this is sufficient.

Page 61 at the end of the justification section, after 'ownership of canal bridges' and before section 7.3 add: **The South East Marine Plan includes the Policy SE-HER-1: 'Proposals that demonstrate they will conserve and enhance the significance of heritage assets will be supported.'**

## Outstanding issues where there is disagreement

### 1. Designating local green spaces

A. Paragraphs 30 - 32 Local green spaces: Please see the Forum's evidence base document '[Potential sites for improved spaces for play and recreation](#)' which addresses the criteria for local green spaces for each site proposed for designation.

Throughout our public engagement people expressed how much they value and appreciate these green spaces. Please see **Engagement Report**, pages 4-5 for appreciation of green spaces, page 45 for mention of Matilda Gardens and page 55 for the area around Daling Way.

Whilst these amenity spaces are attached to housing estates, they are not private spaces only for the benefit of residents. In an area where green open spaces are limited, these spaces are focal points for the wider community to come together. They provide space for children to engage in informal play and for people to socialise. The community also recognised and commented that as open spaces they play a role in providing for biodiversity and help to mitigate poor air quality in the area. Such spaces may not be visibly of the highest quality but the local community understands and appreciates the important and multi-functional role that they play.

Daling Way has 3 tower blocks overlooking the green space, and designation is needed to prevent infill development along Old Ford Road to the west of the Lord Morpeth pub. Locton Green is also the location of tower blocks with very little other surrounding green space and is well landscaped. It's important to protect this space from small infill development along Parnell Road. Brodick House

is another tower block, and the small green spaces at its foot are the only nearby green spaces as the area has become denser with the recent high rise buildings around Tesco's in Gladstone Place. Matilda Gardens is a well-designed green space with a variety of different uses and is a precious community amenity.

LBTH: As discussed in our Regulation 16 response, the Council continues to take the position that the sites at Daling Way, Lockton Green, Matilda Gardens and Brodick House do not meet the criterion in paragraph 102 of the NPPF that requires Local Green Spaces to be demonstrably special.

## **2. Information about the site allocated for housing**

39. Request for more detail on the proposed housing site.

Forum: Since drafting the policy, planning application PA/21/01162/A1 was approved in Dec. 2021 for 16 pre-constructed modular apartments to be used as temporary accommodation for a period of 10 years. We think it unnecessary therefore to give more detail at this point in time.

LBTH: This is an issue on which we continue to disagree: given that the approved scheme is for a temporary development for a period of 10 years, and that this neighbourhood plan is likely to still be in force at the end of that time, the policy should provide detail regarding the future permanent development.