



Strategic Planning Team
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

By email to: localplan@towerhamlets.gov.uk

2 March 2023

Dear Sir/Madam,

Re: Early engagement on the new Tower Hamlets Local Plan

CPRE London is a membership-based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

Thank you for the opportunity to engage in this important consultation.

We have significant concerns about the failure of the early engagement consultation to put forward proposals to address green space deficiency in Tower Hamlets. We are also concerned about proposals for major developments which would lead to further reduction in the amount of green space per person, making matters significantly worse and leaving huge numbers of people without formal or informal space for sports or recreation.

- The consultation recognises that as of 2016/17, there was a total of 0.89 ha per 1,000 residents, significantly less than the local open space standard of 1.2 ha per 1000 residents. The council indicates the population is set to increase with 34,700 new homes, or roughly 100,000 more residents. However no significant large new areas of green space are planned and there is no strategy for creating smaller green spaces e.g. 'streetparks' (converting grey space to green space or mini parks) either.
- Some areas of the borough earmarked for new high-density housing are already home to major new high-rise housing development with very little or no provision for green or open amenity space. For new and existing residents in these areas, the lack of access to any green space is unacceptable.

The purpose of the Local Plan review is not simply to identify space for new homes: it must deliver sustainable patterns of development. A failure to plan for adequate green and open space contravenes London and national planning policy. Even more concerning, evidence shows people who will, as a result of these proposals, live without adequate access to green and outdoor facilities will be less healthy and less happy. The 'town cramming' which is emerging in parts of the borough, is set to be worsened by the proposals set out in the early engagement document, and this is a health crisis in the making.

Without clear proposals for creation of new green and open space, we believe Planning Inspectors should not, in good faith, deem Tower Hamlets' Local Plan sound as it will not be delivering sustainable patterns of development and will be contradicting national and London policy.



As such, the new Draft Local Plan should take the following into account:

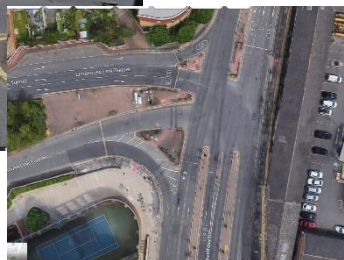
1. Tower Hamlets should include proposals in the new Local Plan to **increase the amount of green space in Tower Hamlets** to ensure everyone has a chance to lead healthier, more enjoyable and environmentally friendly lives; and to tackle the nature and climate crises. **New public parks, nature reserves and SINCs** should be created in Areas of Deficiency such as Whitechapel, Aldgate, Shadwell, Poplar and Leamouth to ensure there is sufficient green space and contact with nature for local residents. Calculations for deficiency should refer to green space **per person** particularly in areas with existing very high-density housing.
 - The new Local Plan should include specific commitments to create large new parks and green spaces to support the borough's growing population.
 - It should also set out specific, clear proposals to create small parks from grey space including under-used roads, and even whole streets or sections of streets, including rain gardens, pocket parks or streetparks (e.g. [Alfred Place](#) in Camden).
2. **A policy should be included on reallocation of kerbside space:** We estimate that, in land use terms, a significant amount of land in Tower Hamlets is kerbside space, most of which is likely to be 'rented' cheaply for private car parking.
 - **The Local Plan should propose re-allocation of land-use for at least 25% of kerbside space in Tower Hamlets** – referencing environmental and social goals and establishing an appropriate target for reinstating kerbside as a public space, to be used for everything from bus and cycle lanes, safe cycle storage, shared mobility parking, delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. Lambeth [Kerbside Strategy](#)).
 - **Additionally, there should be a policy for main roads to be a maximum of one lane** in either direction for general traffic (including main roads) with other space repurposed for sustainable uses.
3. **High rise housing** should be curtailed and 'humanscale' development (eight storeys maximum) should prevail to ensure there is no 'town cramming' (super high density without access to open and green space).

4. **Site Allocation 6 Blackwall Trading Estate and Leamouth Road Depot:** This is an area which has already seen a vast amount of super high-density development and this has left a vast deficit in access to green space. If this site is built out for more high-density housing, this situation will get considerably worse. This site should therefore be allocated for extensive greening and a large proportion of this site should be transformed into a public park.





5. A policy should be included to convert over-allocated road space to parks in areas of deficiency. There should be a clear policy for the south of the borough to convert road space to new green space to tackle deficit of green and open space in these areas. The Plan should state the council will work with TfL and the National Highways to deliver a dramatic transformation for specific parts of the borough affected, including – but not limited to – the following sites:





- 6. The new Local Plan must state clearly that **estate regeneration ‘infill’ schemes should not build over estate green spaces and gardens**. New housing development on estates should be confined to previously developed land and should not leave residents with inadequate provision of green and communal open space. (See also comments on site allocations 7 and 8 below)
- 7. **Site Allocation 7 Aberfeldy Estate:** Jolly’s Green, Millenium Green, Leven Road Green and Braithwaite Park should not be included in this site allocation and these parks should be retained in their entirety for residents to enjoy, not built on.



- 8. **Site Allocation 8 Teviot Estate:** Langdon Park and Uamvar Street Open Space should not be included in this site allocation: these important local green spaces should be retained in their entirety.



- 9. **Site Allocation 10 Sweetwater:** This riverside public green space should be retained, enhanced and expanded.

Thank you for considering these points.
Yours faithfully,
John Sadler
Campaigns Officer, CPRE London