

## London Borough of Tower Hamlets Local Plan

### Matter 4: Energy, Air Quality, Waste, Water and Open Space

#### 1.0 Introduction

Firstplan are instructed by Gregory Brackett, as a representative of the owners and residents of properties and land within the Canal Cottages site. Our clients specific concern relates to the boundary of Metropolitan Open Land (MOL) as shown on the draft proposals map which is considered to be unsound in respect of the Canal Cottages site.

Our concerns are expressed in detail in our Submission Version representations, however we wish to make the following additional points:

#### 2.0 Response to Questions Raised by the Inspector

Q4.4 is primarily directed to the Council. However, we wish to comment on the final two bullet points as follows:

*“Is a new policy designating MOL needed in the LP, in order to support the illustration of MOL on the policies map? If so, what evidence is there to justify the illustration of MOL, and the boundaries shown, on the policies map submitted?”*

There appears to be no evidence to justify the MOL boundaries as shown on the proposals map. It appears that the MOL designation around Canal Cottages was intended to cover Victoria Park and appears to have been incorrectly applied to the site in a “broad brush” manner, which is supported by the exclusion of other properties adjoining the Park and the positioning of the boundary cutting through the site in an unjustified and discordant manner.

*What is the policy approach taken to MOL in the LP and in what way is it consistent with the London Plan, and in particular, policy 7.17?*

It is considered that the MOL boundary as currently drawn is not in line with Policy 7.17 of the London Plan in respect of land within the Canal Cottages site, as it does not meet any of the four criteria set out in Part d of the London Plan policy. It is not distinguishable from the built-up area as it includes four houses and appears as a continuation of properties on Parnell Road; it does not include open air facilities; contain features or landscapes of national or metropolitan importance; or form part of a green chain.

#### 3.0 Soundness of the Local Plan

The current version of the draft Local Plan is not justified as it is not the best strategy when considered against the reasonable alternative of taking the Canal Cottages site out of the MOL and it is not positively prepared as it unnecessarily restricts the potential of the Canal Cottages site.

The proposed boundary is also contrary to the NPPF in respect of Paragraph 139 which states that when defining green belt boundaries the Council “should not include land which it is unnecessary to keep permanently open”. The London Plan confirms that this green belt guidance applies equally to MOL.

## 4.0 Precise Change and/or wording sought

We are seeking a change to the proposals map to omit the Canal Cottages site from the Metropolitan Open Lan designation as shown on the map provided with our submission representations.

An extract of our map submitted at the submission stage is shown again below for ease of reference:

