

Ellie Kuper Thomas

From: Richard Horwood LDC <richard@localdigital.co.uk>
Sent: 23 April 2018 19:01
To: jules.pipe@london.gov.uk
Cc: mayor@london.gov.uk; Ellie Kuper Thomas; Neighbourhood Planning
Subject: RE: Isle of Dogs and South Poplar Development Infrastructure Funding Study (DIFS)
Attachments: Infrastructure_Delivery_Plan_Oct 2017.pdf; TH Local Plan NF workshop.pdf; Service_Offer_0716.pdf

Importance: High

Dear Mr Pipe

Further to my email of 19th April, further documentation has just been drawn to my attention reinforcing why the Development Infrastructure Funding Study for the Isle of Dogs and South Poplar OAPF (DIFS) is rightly part of our Neighbourhood Plan evidence base, and must therefore be produced to the Independent Examiner before his public hearing on 10th May.

The attached documents show that Tower Hamlets Council (LBTH) has not only referred to the DIFS in its Regulation 16 consultation submission as stated previously, but has itself expressly relied on the DIFS as part of the evidence base for its draft Local Plan, and has invited neighbourhood forums to rely on that same evidence base.

It would therefore be wrong for a GLA publicly-funded study to be permitted to support a local authority's Local Plan, while at the same time suppressed by the GLA as evidence for a Neighbourhood Plan in the same area, and for which it is no less relevant.

To explain:

1. In the attached "**TH Local Plan NF workshop**" document of June 2016 (which LBTH has supplied to the Examiner), LBTH sets out its strategic policies regarding neighbourhood forums in the context of its emerging draft Local Plan. In the very first paragraph, it says: "*Where a Local Plan is being updated, **a planning inspector examining a Neighbourhood Plan will also look at the reasoning and evidence informing the emerging Local Plan process....***"
2. I also attach LBTH's "**Service Offer**" document provided to neighbourhood forums in July 2016, which on page 13 points neighbourhood forums to the Local Plan "evidence base", on which LBTH is inviting forums to rely. That expression is hyperlinked to [the evidence base on the Council's website](#), which includes (and links to) [LBTH's Infrastructure Delivery Plan](#) (document SD06) which was published in October 2017 as an express part of the Council's draft Local Plan evidence base.
3. I have therefore also attached that "**LBTH Infrastructure Delivery Plan**". It is this document that describes the supporting evidence for LBTH's draft Local Plan, and which expressly relies on to the DIFS. For example:
 - a. In the 'primary education infrastructure' chapter, para 2.6 on page 29, it says: "*The Council is working with the Greater London Authority on an Opportunity Area Planning Framework (OAPF) for the Isle of Dogs and South Poplar. **The OAPF is supported by a Development Infrastructure Funding study which identifies the infrastructure required to support the growth described in the OAPF.** Schools that have been provisionally identified as potentially required are set out in the table of projects towards the end of this chapter.*"
 - b. The same again in the 'secondary education infrastructure' chapter, para 2.6 on page 35: "*The Council is working with the Greater London Authority on an Opportunity Area Planning Framework (OAPF) for the Isle of Dogs and South Poplar. **The OAPF is supported by a Development Infrastructure Funding study which identifies the infrastructure required to support the growth described in the OAPF.** Schools that have been identified as required are set out in the table of projects towards the end of this chapter.*"
 - c. In the introduction to the 'transportation, connectivity and public realm infrastructure' chapter, para 1.1 on page 69, it says: "*...studies used in the formation of the proposed submission draft Local Plan, such*

as the Transport Strategy and details of studies used in the emerging OAPF all help to shape the information within this chapter.” And then in para 5.1 on page 70: “...the Council will continue to work with partners to ensure this type of infrastructure is delivered to meet demand on a case-by-case basis and in line with the evidence supporting the proposed submission draft Local Plan and the draft OAPF for the Isle of Dogs and South Poplar.”

- d. And there is a particularly clear reference to reliance by LBTH on the DIFS in the ‘public safety and emergency services infrastructure’ chapter, para 6.3 on page 123, from which Table 43 on page 125 is expressly derived. It says: “**The Development Infrastructure Funding Study (DIFS) for the Isle of Dogs and South Poplar outlines the future requirements for additional space required by the emergency services. The projects listed within the DIFS are included within the projects table in section 7.**” (You will have noticed, by the way, that LBTH never refers to it in this document as a “draft” study – which is fair as no update to it has since been produced as far as we know, and it was produced nearly a year ago now.)

I hope this assists you in recognising that the DIFS cannot be used by a local authority to support its policies, and at the same time be denied to a neighbourhood forum for the same purpose. After all, both sets of policies will be used alongside each other as part of the development plan for our area, so it makes sense for them both to be based on the same evidence where possible.

I look forward to sorting this out with you by this Thursday afternoon at the latest.

Yours sincerely

Richard Horwood
Chair, Isle of Dogs Neighbourhood Planning Forum

From: Richard Horwood LDC [mailto:richard@localdigital.co.uk]

Sent: 19 April 2018 16:01

To: 'jules.pipe@london.gov.uk' <jules.pipe@london.gov.uk>

Cc: 'mayor@london.gov.uk' <mayor@london.gov.uk>; 'Ellie.KuperThomas@towerhamlets.gov.uk' <Ellie.KuperThomas@towerhamlets.gov.uk>; 'NeighbourhoodPlanning@towerhamlets.gov.uk' <NeighbourhoodPlanning@towerhamlets.gov.uk>

Subject: Isle of Dogs and South Poplar Development Infrastructure Funding Study (DIFS)

Importance: High

Dear Mr Pipe

Please see below and attached. I am writing to you now as I have not yet received a reply to my message a week ago to the London Mayor’s email address, and the issue is urgent.

It appears that the GLA is seeking to suppress the results of a publicly funded study.

It gives me no pleasure in saying this and I find it hard to believe. But the only plausible explanation is that the GLA – in apparent collusion with Tower Hamlets Borough Council (LBTH) – is seeking to suppress the Development Infrastructure Funding Study (DIFS) for the Isle of Dogs and South Poplar OAPF, to try to undermine the evidence base for the Isle of Dogs Neighbourhood Plan.

Moreover, the DIFS has been expressly asked about by the Independent Examiner who will be holding a public hearing on our Plan on 10th May. Both the GLA and LBTH have objected to its being produced to him, arguing that it’s officially a draft (even though it’s nearly a year old); while at the same time expressly relying on it in their submissions as part of LBTH’s Regulation 16 consultation on the Plan. It is inequitable for some participants in a plan making process to have access to and refer to a document that others have not seen. It compromises the plan process and creates a serious and entirely avoidable procedural irregularity.

I explain the context for this in the attached letter. But in short, the fact is that the study was completed and provided to the GLA on 15th June 2017. We know this as members of the Isle of Dogs Neighbourhood Planning Forum who are also LBTH councillors were given copies of it after the GLA had sent it to LBTH.

The bottom line is this. The GLA and LBTH know full well that there is a huge funding deficiency for the infrastructure needed to support the uniquely dense residential development happening on the Isle of Dogs, and yet they have continued to approve exceedingly dense developments here to satisfy high housing targets. It seems that publication of the eye-watering unfunded infrastructure requirement would be politically unhelpful, particularly in the run-up to the local elections.

I do not want to enter into a public fight over this, as it would be unseemly and is surely unnecessary. It's not as though the growing infrastructure crisis is contentious. See for example the attached Regulation 16 consultation submission by Thames Water, which could not be clearer.

So I ask you please to step in and agree to provide the DIFS to the Independent Examiner prior to the public hearing on 10th May. Preventing him from seeing it would compromise his examination. If he will accept it on a confidential basis, then that's fine by us.

I look forward to hearing from you as soon as possible, and in any event by close of business on Thursday 26th April. If we haven't been able to agree a way forward on this by then, I shall have to assume that the GLA is continuing to try to suppress this information.

Your sincerely

Richard Horwood
Chair, Isle of Dogs Neighbourhood Planning Forum

From: Richard Horwood LDC [<mailto:richard@localdigital.co.uk>]
Sent: 11 April 2018 15:23
To: 'mayor@london.gov.uk' <mayor@london.gov.uk>
Cc: 'Ellie.KuperThomas@towerhamlets.gov.uk' <Ellie.KuperThomas@towerhamlets.gov.uk>; 'Neighbourhood Planning' <NeighbourhoodPlanning@towerhamlets.gov.uk>; 'john@johnparmiter.com' <john@johnparmiter.com>
Subject: MGLA070318-5916, FAO Paul Robinson, Information Governance Officer

Dear sirs

I attach a request for disclosure of the Development Infrastructure Funding Study for the Isle of Dogs and South Poplar OAPF dated 15th June 2017.

Please confirm receipt.

Yours faithfully

Richard Horwood
Chair, Isle of Dogs Neighbourhood Planning Forum