

Richard Horwood (Chair)  
Isle of Dogs Neighbourhood Planning Forum  
Neptune Court, Homer Dr  
Isle of Dogs  
London E14 3UQ

Date: 28 June 2017

Dear Andrew

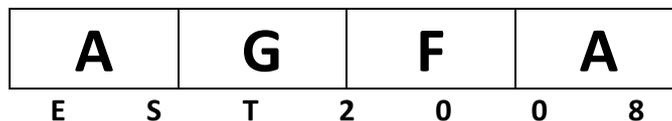
I am writing on behalf of the Alpha Grove Freeholders Association (AGFA), to welcome the draft Neighbourhood plan that is currently out for consultation. The 4 Estates Forum support the basic premise of the Neighbourhood Forum that the Island cannot sustain any more development without infrastructure. It should be no surprise to you that we support the contents of Chapter Four which is on Estate Regeneration which affects us directly (and would affect other home owners in the future where demolition maybe proposed), and our comments are as follows:

#### **JUSTIFICATION AND EXPLANATION OF POLICIES**

Tower Hamlets Council's comments make the valid point that policies should be evidenced, with reference to local and national planning policy frameworks where relevant, along with accessible explanations as to why they are necessary. The briefing accompanying the draft Neighbourhood Plan was prepared based on the experience of the process of resident engagement on our estates, as well as research into good and bad practise in other areas. The document contains most of the justifications and explanations needed. The AGFA suggests that these passages are added, to the NPF's Quick and Long Plan, then if you feel appropriate AGFA and the IOD NPF could discuss possible revisions

#### **ADDRESSING CONSULTATION RESPONSES**

The main criticisms of draft estate regeneration policies – from Tower Hamlets council, and Quod on behalf of One Housing Group (OHG) and Argent – make the same central point, that the draft policies cannot legitimately be considered 'land use' matters, and are therefore invalid as policies (although they could be included as expressions of the communities' wishes in an appendix, effectively making them recommendations that cannot carry any weight with officers or councillors when making decisions on planning applications, as opposed to policies which have been sanctioned by a planning inspector).



We understand, Neighbourhood Plans are relatively new. The AGFA believes that regulations are unclear with regard to what can legitimately be included in them as formal ‘policies,’ particularly concerning estate regeneration, as few Neighbourhood Plans have included any detailed proposals on such issue. As one example, St Ives Plan imposes restrictions on who can buy new homes in their area. A planning inspector approved this policy, despite the fact that it doesn’t directly concern a ‘land use’ matter. For this reason we support the retention of all draft policies, as policies, with some additions below. Most of which relates directly to Freeholders and the use of their land(s) in particular; and argument that both the council and OHG & Argent have already made in their representation

We also suggest that the IOD NPF consult Tower Hamlets council officers to obtain a detailed analysis of regulations and precedents of what can and cannot be included in Neighbourhood Plans as policies, and if required AGFA can attend such meeting along with the IOD NPF. It may well be possible to explain and justify all or most of the draft policies as methods of implementing general principles contained in Tower Hamlets Local Plan, Mayor of London Draft Policies, and the National Planning Policy Framework, so we would like to work with the IOD NPF to ensure that policies are defended and explained as robustly as possible.

We have also seen the representation from the Four Estate Forum and fully support their views, amendments and argument; which are very much in line with our views; their headings that we support:

**ER1 – RIGHT TO VOTE TO APPROVE OR REJECT FINAL PROPOSALS**

**ER2 – CONDUCT OF ELECTIONS**

**ER3 – RESIDENT PARTICIPATION IN A TRANSPARENT, INCLUSIVE, OBJECTIVE DECISION MAKING PROCESS**

**ER4 – RIGHT OF RETURN**

**ER5 – TENANTS’ RIGHTS AND COSTS**

**ER6 – LEASEHOLDER AND FREEHOLDER RIGHTS**

**ER7 – ESTATE SMALL BUSINESSES, RETAILERS, AND COMMUNITY ORGANISATIONS**

**ER8 – PUBLIC PROFIT REINVESTMENT**

**ER9: INTERMEDIATE AFFORDABLE HOUSING**

**ER10 – RECOMMENDATIONS FOR HOUSING REGENERATION**

Before we can support an adopted NPF’s quick plan. We suggest the following amendments and additions detailed below are adopted to the NPF’s Quick and Long plan:

Amendment(s) to ER6:

<b>A</b>	<b>G</b>	<b>F</b>	<b>A</b>
E	S	T	2 0 0 8

## ER6 – LEASEHOLDER AND FREEHOLDER RIGHTS

Proposed amendments are in italic Blue and underlined:

Policy ER6:

Point 2 (The policy):

They must retain (as a minimum) an equity share in their new property equivalent to the true Market value of their existing property as determined by the Independent Organisation, and shall not be less than the price which the freeholder or leaseholder paid for their existing property.

Point 2 (Suggested amendment to read):

Initially, they must retain (as a minimum) an equity share in their new property equivalent to the true Market value of their existing property as determined by the Independent Organisation, and shall not be less than the price which the freeholder or leaseholder paid for their existing property. *This policy then will gradually move into point 3 of this policy*

Proposed Additional Policy to adopt:

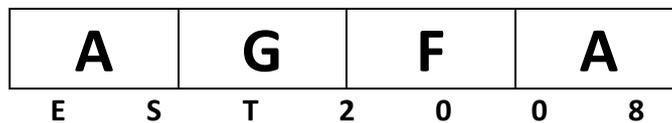
To adopt / include the following policies under ER6:

## ER6 – LEASEHOLDER AND FREEHOLDER RIGHTS

- A. ***“To encourage the Freeholders who own land to create a “Community Land Trust”; thus that trust to engage with the local Housing Association, Council or Developer to develop the land to an agreed plan***
- B. ***“To encourage the freeholders to engage as business partners within any future regeneration or development by way of lending their land within the development pot in lieu of proportionate share post calculation of the land value, land mass and total development viability (via options)***
- C. ***“To ensure that the freeholders (or land owners) are part of the committee from the start to the end of the development and of the future management committee of the said developed area”***
- D. ***“Where reasonable the council should help and support any freeholders group such as AGFA (Land owners) collectively (but not individually) within the NPF boundary to build on their own, under the “Community Right to Build Order” within the Planning Localism Act 2011”***

The above proposed policies are directly linked to “Land Use” therefore they can easily be adopted. We are mindful of the Council; Housing Association(s) and Developer(s) view(s) on “Land Use” and do not feel that the above proposed policies are contradictory

As a matter of fact these proposed policies are complementary to any future regeneration and development within the boundary of the Neighbourhood Forum



We also believe that the above proposed policies appreciate the Localism Act 2011 directly in encouraging local landlords to be engaged and involved

Moreover, these policies should be incorporated as it also allows the local Council, Housing Associations and Developers to significantly reduce their cost of redevelopment or regeneration by simply sharing the future profits. As whoever, involved will not have to pay out or buy out the Freeholders / land owners of the said Land(s) which can be very expensive. This will also enable to avoid future CPO's (Compulsory Purchase Orders) and less bureaucracy

Thank you for giving us the opportunity to comment on the draft quick plan; I on behalf of the AGFA would like to thank you in advance for considering the inclusion of the above proposed policy within the quick and long Neighbourhood Plan(s)

Yours sincerely,

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