

CABINET

Tuesday, 19 September 2017 at 5.00 p.m.
C1, 1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London,
E14 2BG

SUPPLEMENTAL AGENDA

APPENDICES FOR REPORTS 5.1 to 5.6, 5.9 and 5.10

The meeting is open to the public to attend.

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For further information including the Membership of this body and public information,
see the main agenda.

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5 .10	IDF: Approval of S106 Funding to Design and Fit out of Training Centre - at the former London Fruit and Wool Exchange (LFWE)	804 - 831	Spitalfields & Banglatown

LIVING WELL IN TOWER HAMLETS

The Adult Learning Disability Strategy 2017-2020



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FOREWORD

Hello and welcome to the Strategy.

Both of us, the Health and Wellbeing Board and all the member organisations are determined to do everything we can to make sure that all people with learning disability in the borough live well and enjoy a full life, with as much independence as possible.

We are proud that there is good support for people in Tower Hamlets, but we know there are many things that could be better. We want to make improvements in the next three years. The Council, the NHS and other organisations have limited resources and we can't do everything at once. This Strategy sets out the most important things and we will focus on these.

We want to make sure people with learning disability are treated equally and respected, that their rights are recognised and that they can more easily access local support. We want to do more to promote their inclusion and independence.

This is a partnership Strategy for everyone. Many people from local organisations, the Council, the NHS, private companies and community groups will have to work with each other and with people with learning disability and their families and carers to make improvements happen. We know that when people work together for something they believe is important they can do a lot. We want to encourage everyone in Tower Hamlets to play their part and work together to make sure that adults with learning disability in Tower Hamlets really do live well.



Cllr Saunders
Chair of Tower Hamlets
Health and Wellbeing
Board and Cabinet
Member for Health and
Adults Services



Dr Sam Everington
Vice Chair of Health
and Wellbeing Board
Chair of NHS Tower
Hamlets Clinical
Commissioning Group

INTRODUCTION

This Strategy builds on the Health and Wellbeing Strategy priorities of

- Communities driving change;
- Creating a healthier place;
- Employment and health;
- Developing an integrated system;

and says more about achieving these for adults with learning disability.

In developing the Strategy, we looked at national and local policy and research and what happens in other places to understand what we have to do and what works well. We considered the data in the Joint Strategic Needs Assessment.

Many local people, staff and organisations gave their ideas. Most importantly, it was the views of many adults with learning disability and their families and carers that determined the key things we will do.

Many people are supported in the community by family and friends. In the consultation, people told us that overall, the support in Tower Hamlets is good but there are areas which need improvement. Too many people live in residential care outside the borough and too few have jobs. The right support is not always there at the right time.

People with learning disability have the right to be treated equally and to control their own life. The Equality Act says adults with learning disability must be supported to live an ordinary life in the community. Government learning disability policies say that the Council and the NHS have to:

- reduce health inequality;
- reduce the number of people who are in hospital or registered care homes and how long they stay there;
- improve the quality of hospital and community provision;
- have more community services; and
- increase employment.

This Strategy says how we will do that in Tower Hamlets. It covers:

- What adults with learning disability say is important in their life;
- What we have been doing to support that;
- What we will do next and how we will know it is working.

The Background Information document explains in more detail why and how the outcomes and actions were decided.

http://www.towerhamlets.gov.uk/lgnl/health__social_care/help_for_adults/help_for_adults.aspx

THE TOWER HAMLETS CONTEXT

From national estimates

2.17%

of the adult population would be expected to have learning disability which equates to

4,848

people in Tower Hamlets.



This will increase due to:

population growth

(Tower Hamlets population is expected to grow by 22% from 2016-2026) and

longer life expectancy

for those with learning disability.



In March 2017,

961

people in Tower Hamlets were registered with GPs as having a learning disability

46%

of these were of Asian background, mostly Bangladeshi.



NOT EVERYONE NEEDS SPECIALIST SUPPORT

In June 2017,

882

people were known to the Community Learning Disabilities Service in Tower Hamlets which is below national estimates

that **1,100** people or **0.5%** of the adult population would be known to local Council or health learning disability services.



People have different levels of care and support, depending on their needs

659

people had paid support

154 people received a direct payment

20 people with the most complex needs have a continuing healthcare package.



Adults 18-25

Adult services work with people over 18. The law says that children's services should continue to support young people with a disability until they are 25. So the Children and Young People Plan and the Children's SEND Strategy is also relevant for people aged 18 to 25 and children and adult services have to work together from when young people are 14 to meet their needs. A review looking in detail at transition has just started and will report in the autumn.

Linked plans

The Ageing Well Strategy covers plans for improving outcomes and support for all people over 55, including those with learning disability, so it is also relevant. The Autism Strategy and the Carers Strategy are also relevant to adults with learning disability.



Inclusion

Adults with learning disability are equal to everyone else with the same rights to participate in and be included in the community. The Equality Act 2010 says disability is a protected characteristic and organisations have to make reasonable adjustments and include adults with learning disability. There are many other plans and strategies that talk about improving things for everyone. These plans include:

- The Community Plan
- The Housing Strategy
- Economic Development and Employment Strategies
- The Community Safety Plan
- London Adult Safeguarding Procedures
- The North East London Sustainability and Transformation Plan.

We will work together with the people responsible for these plans and strategies to make sure they understand and include the specific needs and concerns of adults with learning disability and follow the priorities and plans in this Strategy.

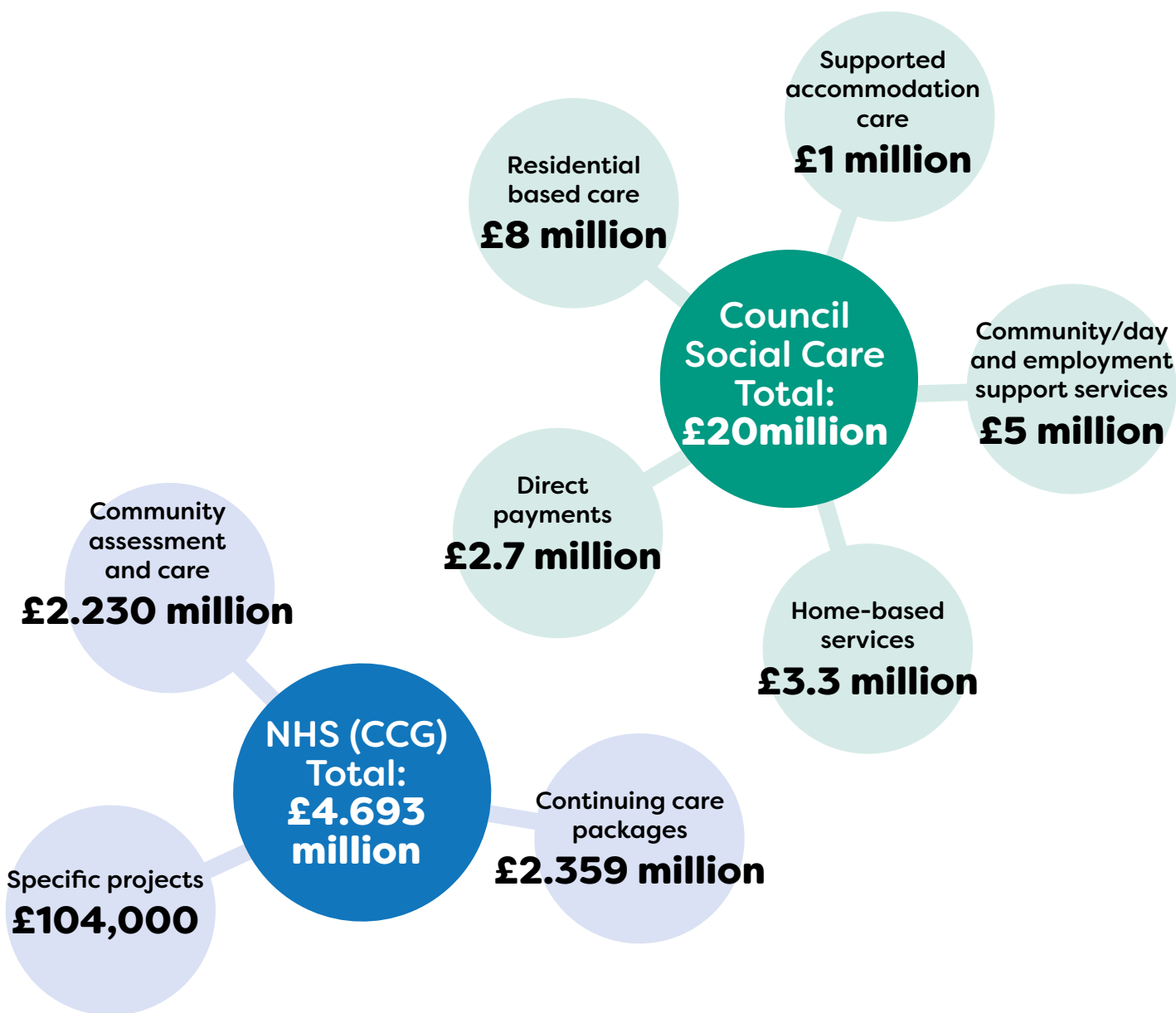
Adults with learning disability can get support from different levels of service. At each level there are things for everyone and things specially for people with learning disability. In Tower Hamlets there are many different types of support at all levels.

- **Family and Community:** such as family members, partners, neighbours, community members and groups, self help groups and advocates.
- **Primary or Universal:** services for all such as information and advice; general practices, Idea stores, leisure centres and community centres.
- **Secondary:** services for people with more needs such as supported housing, care packages and specific group activities and day centres.
- **Tertiary:** services such as placement in registered accommodation.

The Council and NHS will keep making sure there are many different places in the community where adults with learning disability can get good quality support. Community groups and voluntary organisations give a lot of the support and add extra resources themselves such as grants from trusts and donations. We will encourage businesses to give resource and support too.

The total amount of local Council and NHS money that will be used for specific services for adults (over 18) with learning disability in 2017-18 is given in the diagram below.

The actions to improve things depend on building self help and community support, using money differently and changing ways of working rather than just spending more money because this is the right way forward.



The plans, actions and outcomes set out in this Strategy need to be delivered within the agreed resources available in future years and therefore, may need to be adapted.

WHAT PEOPLE SAID

In spring 2017, we asked people what is important in their life, what they can do themselves to achieve that and what ideas they had to better support adults with learning disability to achieve those outcomes.

We had responses from 106 adults with learning disability living in the borough (11 by online survey, 62 by easy read questionnaires and 33 in face to face discussions).

46 supported having “live well” and 43 supported having “a full life” as the vision. Several favoured both.

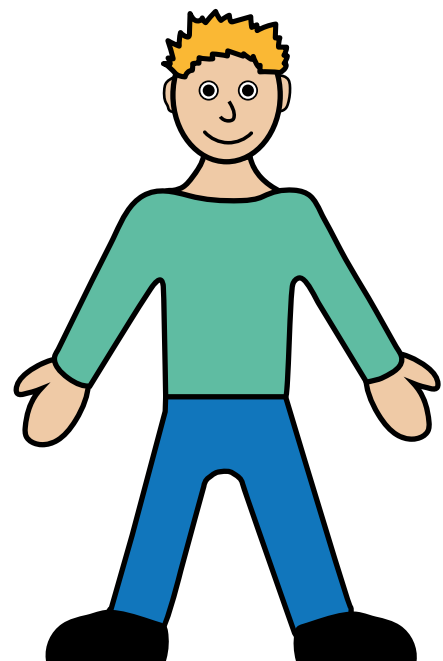
Most people said there is good support in Tower Hamlets and this should be maintained. They told us what was important to them. This determined the outcomes that we want to achieve.

We looked at what adults with learning disability, carers, service staff and members of the public said as part of 11 consultations undertaken between 2014 and 2016.

Forty-eight carers, seven carer support workers and 157 service staff and members of the public participated in discussions (during 2017) about what would improve outcomes.

These discussions shaped the plans in this Strategy for what we will do next.

Many people said it was very important that the actions were implemented; that the Strategy does not just sit on a shelf.



What people with learning disability said was important

More leisure activities, sports and physical exercise that are affordable



Having friends, family support and relationships



Being able to do a wide range of activities - and join in social clubs and community activities open to all



Have places to go and things to do in the evenings and weekends



Choosing what you want to do and where you want to live



Improving communication so people do not ignore you and understand you



Living locally near family and friends and not having to travel far



Getting information from staff and support with diet and exercise to be healthy



Having a job and help to get it and there should be more jobs



Having training including life skills needed for independence



Having more easy to read information in people's own language with more pictures and less words



Being listened to, respected and heard by professionals and being treated as an individual



WHAT ARE OUR AIMS?

OUR GOAL (VISION) is that – Adults with learning disability in Tower Hamlets live well.

This means they will:



These are the outcomes we want to achieve.

They reflect the Tower Hamlets Outcomes Framework.

To achieve these outcomes, the Strategy has objectives to:



OUR WAYS OF WORKING

Everyone has to support the values and principles of the Equality Act and UN Convention on the Rights of Persons with Disabilities and work in ways that show this.

- Treat people with respect and dignity and recognise them as rights-holders.
- Recognise people as independent and entitled to make their own choices and decisions and to give consent and facilitate this with access to appropriate advocacy when required.
- Communicate effectively and provide information in accessible and easy read formats in line with the accessible information standard.
- Actively encourage and facilitate the meaningful and effective participation of people, ensuring they have influence.
- Actively promote inclusion and empower, consult and engage with people with disabilities.
- Ensure people can effectively access the full range of support including information, communications, facilities and services and the physical environment.
- Respect people's differences, accept people for who they are, recognise and value their strengths and ensure people have the same opportunities as everyone else.

1. BE HAPPY AND HEALTHY

Key points

- People with learning disability have poorer health and die younger with a lifespan that is 14 years less for males and 18 years less for females.
- Adults with learning disability should have a health check every year but in Tower Hamlets last year only 57% of people did. This is above the national average of 46%.
- When adults with learning disability have physical health problems, support staff do not always understand their needs. Health services do not always communicate well with the adults, their carers and other staff. The right care is not always given.

“My doctor sent me an easy read letter to tell me that my annual health check was due. They give me a double appointment every time I go there. It feels like they know and respect me. I want them to give me information back when I have seen them. I often have to go to hospital for my health problems. I wish all the appointments were on the same day and health staff talked together so everything was more joined up.” Peter

What we have done and are still doing

- It is now part of the job of the Community Learning Disability Service (CLDS) to help universal health services develop the awareness and skills of their staff so they can better support adults with learning disability. CLDS now also supports staff in all local organisations to talk about healthy living with the adults they work with.
- We funded a learning disability nurse for a year. The nurse trained general practices about health checks for adults with learning disability and worked on the data systems. Health checks have increased by 10% since 2015-16. CLDS now helps make sure everyone has an annual health check and a health action plan.
- A plan to improve support for adults with learning disability admitted to hospital with mental illness has been developed and is being implemented.
- We joined a national pilot and do local reviews of deaths of adults with learning disability. We use the learning to improve the quality of health services.

What people said

- There is a need for more mental health support for adults with learning disability and for support when people have a death in the family or are sad.
- Much more health promotion is needed.
- Give more emphasis to health training for healthy lifestyle, diet, exercise and health checks and use data to target improvements.

What we will do next

- Make sure family and staff encourage people to have vaccinations and screening and go to the dentist. Give information and support about nutrition, exercise and contraception.
- Make sure family/carers, social care and other services know about annual health checks and action plans and encourage people to have them. Be more flexible about doing the checks.
- Make sure that when people feel sad or on edge, they can get early counselling help from staff trained to work with people with learning disability.
- Make sure that when people go to hospital, their family/carers can also go so they continue to be supported by a familiar and trusted person.
- Introduce a card with key information and redesign hospital passports so hospital staff can access them and use them to understand and respond to people's needs.

- Make sure health staff communicate well with people and give them easy to understand information after each contact.
- Introduce a health quality checker scheme so adults with learning disability review services against standards.
- Complete a review of all people with learning disability on psychotropic drugs in line with the NHS guide on stopping overmedication of people with learning disability.

How we will know it is working

- 75% of people have an annual health check and a health action plan.
- More adults with learning disability have health screening and immunisations, have a healthy weight and live longer.
- Adults with learning disability spend less time in hospital and have the right care.
- Adults with learning disability have easy access to high quality health care.



2. LIVE LOCALLY

Key points

- > In 2016-17 and 2015-16, 69% of adults with learning disability lived in their own home or with their family. This is close to the London average of 66.8% and below the national average of 73.9% in 2016-17.
- > However, 123 of the 132 people placed in a registered care home by the Council are not in Tower Hamlets. 12 people are in supported accommodation out of borough.
- > It is difficult for the 46 young people aged under 25 in residential care out of borough to come back as there are not enough suitable places to live locally.
- > Five young people are ready to move out of their out of borough residential education placement each year.



What we have done and are still doing

- > We made detailed plans to develop more accommodation options in Tower Hamlets that offer different levels of support for adults with learning disability. We are now starting on the actions.

What people said

- > Develop more housing and support options.
- > Give clear information so people have choice.
- > Make sure each new build housing development includes some flats for people with learning disability.
- > Staff should be clear and say what they will do and when and keep to that.

What we will do next

- Involving their family, review the needs of people living out of borough and plan for those who want to come back to live locally.
- Develop a greater range of local accommodation and support options. This should include:
 - women only supported living;
 - independent places for adults with learning disability within new housing developments;
 - a new housing support service for young people now in residential placement out of borough;
 - setting up a scheme where local community members offer respite in their homes (Shared Lives).
- Make sure people are given clear information and have choice about where to live.
- Make sure there is enough local support for people who come back to the borough.
- Foster culture change in staff so they develop plans to support people to live in their local community as independently as possible, rather than looking to place people in registered accommodation out of borough.

How we will know it is working

- 59 people (including young people) who live out of borough will come back to live locally over five years.
- 55 day placements and 500 nights of respite are provided by the Shared Lives scheme over three years.
- Fewer people will be placed out of borough and more people will live in supported and independent accommodation locally.

“It is really good that where I live, staff are there to give backup and help 24/7 when I need it with things like managing money and going to the doctor. I can do group social activities too with the other people living there. I can choose my keyworker. I don’t have family there for me, so it is good to have the support of staff. I am glad it is in Tower Hamlets because I grew up here and know the area and am still near friends. I am learning about living independently and want to move into my own place when I can.” Aleya

3. BE PART OF THE COMMUNITY AND INVOLVED IN LOCAL ACTIVITIES

Key points

- There is no existing way to make sure adults with learning disability are involved in the strategic planning, commissioning and delivery of support.
- People said they wanted to be involved in a variety of community activities near to where they live.
- Community members have said they want adults with learning disability to be more included within general local activities.



What we have done and are still doing

- A development project to make sure adults with learning disability are involved and supported as members of the Learning Disability Partnership Board and its subgroups and in all aspects of the planning, commissioning and delivery of support has started.
- In 2016-17, 250 people were supported to participate in activities provided by several day centres across Tower Hamlets or by individually tailored support.
- The Accessible Transport Forum work closely with TfL and the DLR to support them to make their transport accessible. The Council's own transport and community transport also help those who need it to get to activities and support.
- People have travel skills training so they can use public transport independently.

What people said


- There should be specific activities for older people with learning disability.
- More needs to be done to build people's independence and self esteem.
- Reach people in the community who are not in touch with services.
- Promote people's positive contribution and include them in mainstream community activities and primary care services with reasonable adjustments, treat them equally.
- Build community capacity to support people.
- Some people slip through the nets. Services need to reach out so they don't.

What we will do next

- Offer a wider range of more flexible and personalised activities in the day and evenings and weekends and activities specifically for women and older and younger people, so people have choice.
- Enable people to join in general community activities such as gyms, community centres and in the Idea Stores as well as activities in day centres especially for adults with learning disability.
- Promote local community activities with fewer words and more pictures.
- Help community members and services to understand, respect and include people with learning disability and treat them as equals.
- Do more to help people learn to manage their money by using pictures and interactive activities.

How we will know it is working

- An increased number of people will participate in a wider range of community activities.



“The activities we have are very good. I love computers and I have learnt a lot about computers. I have learned about managing my money. Staff helped me to find a work placement and I have worked packing boxes and going to the post office to send them.”

Richard

4. WORKING AND VOLUNTEERING

Key points

- > Many adults with learning disability said through the consultation that having a job or volunteering was very important to them so they can be involved and contribute as well as earn money.
- > They said there is a lot of good support and training locally but not enough jobs.
- > 4.9% of adults with learning disability were in paid employment in 2015-16, which is below the London average of 7.5% and the national average of 5.8%.

What we have done and are still doing

- > Several organisations provide skills development, employment training, support and experience for people with learning disability. Some 60 people per year are supported into employment currently.
- > Members of the Health and Wellbeing Board committed to set a lead in employing people with learning disability in their own organisations.

What people said

- > Work with companies so there are more jobs for people and provide more supported employment through social enterprises.
- > People in work need somewhere/one to go to for early advice and support to prevent them getting stressed and into financial difficulty.
- > Education is the gateway to employment so it is essential to help with improving reading and writing taking an approach that starts from where people are and is pitched at their level.
- > It is necessary to have more accessible, easy ways to find out what is available.



What we will do next

- Work actively with local businesses and employers to create more and more flexible jobs, internships, apprenticeships, supported work and volunteering opportunities that are available for people with learning disability.
- Workpath (the Council's employment support service), the Careers Service and other local employment support services will give people advice and support to help them get work experience, an apprenticeship, job or volunteering opportunity.
- Encourage families, services and people from childhood onwards to have high aspirations and support people to achieve their wishes to have a job and not depend on services.
- Make sure a range of education, training, work experience, volunteering and supported employment is available locally and is accessible to people with learning disability.

- Make sure that centre, accommodation and support staff and families/carers encourage and support people to aim high and access jobs, training and volunteering.
- Develop peer support to help people get and keep jobs.
- Make sure people and their family/carers understand what they earn and the effect on their benefits.
- Develop local learning that is accessible to adults with learning disability and is adapted to their needs. This should include reading, writing and numbers.

How we will know it is working


- 110 people will be supported into employment per year for four years so that there will be 11% in paid employment in three years time.

“I went to employability training once a week with my school class from when I was 16. They helped me get work placements with ASDA. Then I had training at Ocean View Café in Food Preparation and Coffee Making and I did Food Safety and Health and Safety at work. Now I work full time at a café in the Excel Centre. I help with catering at big events and make and serve drinks to VIPs. Now I work I can do more things for myself, have more money, am more confident and happy.” Halima

5. HAVE CHOICE AND THE RIGHT SUPPORT

Key points

- Most adults with learning disability have their needs assessed and are well supported in the community. No-one has been admitted to an assessment and treatment unit in the last five years. This is very positive compared to other areas.
- People said professionals and services do not work together and care is not joined up. Annual reviews do not take place and people are not involved. The support on offer to people is not clear.
- Many people also said they do not know what is available to support them.
- Although 92% service users with learning disability are identified by social care as having self directed support, many people said in consultations they do not always have a choice about the support they receive.
- Adult and children's services have different approaches. Many people said that joint planning does not start early enough and they do not have enough information about the changes. So the 30 or 40 young people who come into adult services each year and need ongoing support, experience difficulties.
- Carers say they have to fight to get support for themselves and the adult they care for.



“I can do a lot for myself and I know what support I need. It was good when my social worker asked me to write and draw what I wanted and included me and my family in the care planning meeting. She made sure I got the support I wanted.” Farida

What we have done and are still doing

- All adults with learning disability have a needs assessment, a personalised care and support plan and have more choice and say in that.
- Tower Hamlets is trying out a new way that people can use their social care and health budgets together in one care and support plan and can choose and manage that support themselves. This is called Integrated Personal Commissioning (IPC). We are one of 18 test sites in England.
- Advocacy is offered by a local organisation (Tower Hamlets MIND) to all adults with learning disability who are in Mile End hospital with mental illness. Another local organisation, REAL, makes sure advocacy is provided to people when they need someone to help them get support. Another organisation, Powher, makes sure the views of people who cannot make decisions themselves are heard as part of the deprivation of liberty process.
- A review of transition from children's to adult disability services has started.
- 93 people who also have multiple longterm conditions became part of the Integrated Care Project. They have a care coordinator and a personalised care plan and participate in multi-agency discussions to ensure coordination.

- A Carers Strategy has been developed. Carers are involved in planning new services.
- We now ask people to help pay for their care and support, depending on their income.

What people said

- Staff should communicate directly with people in simple language and use Makaton more.
- Continuity of the worker is important.
- Services should personalise provision more and respond to individual's interests and needs. They should recognise the individuality of people and provide support, enabling them to have some separate time away from their family.
- Staff and services do not work together. Services should be better integrated and staff should share information.
- More local and community support for carers is needed – emotional support, peer support and individualised advice and information provided by consistent staff who speak their language. Staff should communicate better with carers.
- Reviews do not always happen and people are not involved with them.
- Providers need to share information more and clarify who the lead is when someone is in touch with several organisations so there is one common plan.

- Involve people in planning their own support and care and train and support them to make informed choices. Make sure there is more advocacy support.
- More coordination and joint working between children and adult services at transition is needed, as is information sharing with carers.
- People should be prepared for when their parent carer is no longer here.
- Staff should be valued - the people who deliver services and support are very important.
- Make sure people can get advice from someone who knows about learning disability, can explain the choices and options people have and can build people's confidence to make their own choices. This is especially important for people who do not have family or service support.
- Make sure people and their family/carer are involved in their own personalised assessment, support plans and reviews - and that regular reviews happen.
- Make sure staff work together and share information so people have joined up care and support and do not have to repeat their story.

What we will do next

- Make sure there is simple, jargon free, up-to-date and clear information using pictures about the local support available. The information should be included in the Local Offer and Community Catalogue, so people can easily get it with support and advice from the Idea Stores.
- Make sure that support is culturally relevant to people and their family/carer and that information is accessible to those whose first language is not English
- Make sure more people, their family/ carers and support staff know about independent, issue based advocacy support and can quickly get it when needed.
- As part of Integrated Personal Commissioning, offer people a joint person centred plan and an integrated personal budget so they can actively manage their needs.
- Start multi-agency planning for adulthood jointly across adult and children's services with young people and their family/carer from age 14.



- Promote a rights based culture, so that all organisations ensure their services are accessible, make reasonable adjustments, follow the accessible information standard and train staff to communicate well with and be responsive to people with learning disability.
- Make sure all policies and strategies developed in Tower Hamlets include and address the needs of people with learning disability. These include:
 - the Tower Hamlets Together plan for GPs, hospitals and community services to join up services better and to have a 24/7 single point of access for all care;
 - the Tower Hamlets Together redesign plans for acute care, crisis, community health services and support for adults with complex needs and long term conditions;
 - dementia services, older people's services and end of life care.
- Make sure carers (especially when English is not their first language) know about and get support including respite. Encourage people to plan together for when older family members/carers can no longer give support.
- Support recruitment drives to attract more, younger, male and female care staff to work locally so people can have choice about their keyworker.
- Value, develop and support staff so they work with care and compassion and stay.

How we will know it is working

- 100 people have a joint plan that covers health and social care needs and 20 people have an integrated personal budget by March 2018, to increase each year towards the aim that 100% of care plans are joint and 20% have an integrated personal budget.
- More people each year report they have choice and the right support.
- Routine reporting by all services shows people report positively on their experience and service quality.

“I want to be in control of my own life. Staff supported me to have a direct payment. I can choose my own personal carer and ask them to help me do what I want to.” **Sayed**

6. BE RESPECTED AND SAFE

Key points

- People said they do not feel safe in the community or on public transport.
- Not all staff in services understand and follow the principles for safeguarding vulnerable adults or “hear” and respond to what adults with learning disability say.
- Many people said they have been bullied. Staff report that young people and adults with learning disability are vulnerable to and have experienced hate crime, being forced to marry, violence, being drawn into illegal activity or being sexually exploited. However, data reports do not show this.
- People are vulnerable to financial exploitation. Services report many people do not understand complex letters and repayment agreements and get into serious debt. Many families experience financial hardship.

What we have done and are still doing

- The safeguarding guidelines for staff have been rewritten and staff are having regular safeguarding training.
- Services run money skills sessions and CLDS are developing a project to teach parents/carers how to support people with financial management.
- The Safeguarding Adult Board ran an event for people with learning disability about keeping safe.

“I have learnt independent skills like travelling on my own and how to be safe when on my own and now I go by bus myself to get around. I now work at the Council one day a week and have made friends there. It is good to be involved and I feel respected. I am a member of the Partnership Board because I want to speak up for people with learning disability and be their friend.”

Samantha

What people said

- Help people feel safe, prepare for moving into independent living and travel on their own.
- Campaign to remove the stigma of learning disability and make it OK to talk about.
- Champion that everyone in the community should have respect for people with learning disability.

What we will do next

- Support staff to use activities, easy to read information, pictures and technology to help people have a good understanding of how to keep themselves safe and who to go to if they feel unsafe.
- Promote a culture of respect for people with learning disability among the community, schools and local organisations.
- Raise the awareness of staff in organisations about how to make sure that people are not vulnerable to hate crime, financial or sexual exploitation, violence or extremism.

- Make sure more people are helped with financial management and that agencies adjust their communication with people with learning disability rather than send out standard letters.
- Ensure that improving the quality of the service response to the safeguarding needs of people with learning disability is specifically addressed within the Safeguarding Improvement Plan.

How we will know it is working

- An increasing number of people each year report they feel respected and safe.



TRANSFORMING CARE

Key points

- The government asked each area to improve community services for adults with a learning disability and/or autism who display behaviour that challenges, including those with mental illness, so they do not have to be in hospital.
- In Tower Hamlets 143 people were identified as being in this group.
- Of these, 21 people have the highest needs; with eight in registered care and 13 identified as being at risk of admission to registered care. In April 2017, just three people were in specialised facilities funded by the regional NHS Specialist Commissioning Group and one person was in a secure learning disability hospital. Four people were in Mile End Hospital with mental illness and a total of seven were admitted in 2015-16. This compares positively to other areas, and we believe this shows that in Tower Hamlets, people are well supported in the community.



- All those with the highest needs should have an individual care and support plan, behaviour support, plans for what to do in a crisis and a communication passport. Intensive 24/7 multidisciplinary health and social care support, specialist respite and crisis support and local accommodation should be available to them.
- The government also said all staff in all services for people with learning disability and in mainstream services should have training so they can positively support people whose behaviour is challenging.

What we have done and are still doing

- We looked at what is happening locally with this group against the nine principles of good practice and got views from over 100 people. We agreed to concentrate on increasing local accommodation and developed a plan.
- CLDS is making sure that everyone with challenging behaviour has a personalised care plan that fits good practice principles and a named contact person.

- CLDS meet with the whole family when people are at risk of going into registered accommodation and, where possible, agree a support plan that keeps them in the community.
- All staff in the CLDS had positive behaviour support training so that they can better meet the needs of this group.
- Two sets of training were held so all the different people supporting a number of individual adults with learning disability with challenging behaviour developed a common understanding of and approach to positive behaviour support.

What we will do next

- Make sure that accommodation suitable for people with challenging behaviour is developed locally so people now in out of borough residential care can come back into the local area. (See section 6 of this Strategy).
- Provide regular training in positively managing challenging behaviour to families, care workers and staff from a range of local organisations.

- Make sure that local day opportunity providers include and positively and effectively support people with challenging behaviour.
- Make sure that mainstream services such as IAPT and crisis care support this group of people.

How we will know it is working

- Fewer people with challenging behaviour move more than 10 miles from Inner North East London.
- There is a 20% reduction in the use of registered care by this group.
- Nobody from this group is placed in hospital away from the area or readmitted within two years.
- All individuals in this group have a personalised care plan that fits the good practice principles.

“I didn’t like it when the centre said I couldn’t come back because of my behaviour. It helped me when the staff where I am now and my family all used the same way with me. I want to be with other people.” Dave

MAKING IT ALL HAPPEN

The Learning Disability Partnership Board (LDPB) will make sure the actions in this Strategy happen. The members are adults with learning disability, carers and staff from the Council, the NHS and local provider organisations.

A wider Reference and Engagement Group will be set up so that adults with learning disability and their family and carers are fully involved in making decisions about all local strategic and service planning and delivery. A co-production project is starting to make sure this happens and to support the adults to be fully involved.

There is a delivery plan for this Strategy which sets out, for each outcome, details of the actions that will be completed, by whom and by when for the things the Strategy says we will do next. It also sets out how the results will be measured.

Some actions will be for individual organisations, such as the Council or Community Learning Disability Service, to do. Others will be done by different organisations working together in the subgroups of the LDPB.

There will be a subgroup for each outcome area which will have responsibility for making sure the actions are completed and there is improvement in each outcome area.

There will be two specific discussions each year with the Tower Hamlets Together Complex Adults Programme Board to make sure that the Transforming Care, health and right support actions are completed and the outcomes are achieved.

An important next step is to develop an adult learning disability outcomes measurement framework that is shared across the partnership and part of the overall Tower Hamlets outcomes framework. All local providers would use this and their actions and outcomes would contribute to it. It would be part of their contracts that they did this.

The LDPB will check every year to see how things have progressed and what difference this made. It will study the data collected to help measure how things have changed and review whether the outcomes for adults with learning disability have improved and the goals of the Strategy are being achieved.

Every year, the LDPB will report on progress to the Health and Wellbeing Board and to a forum for adults with a learning disability.

The LDPB will also review this Strategy and update the action plans for each outcome every year.

If you would like to be involved please contact Matthew Richardson
Email: Matthew.Richardson3@nhs.net

Appendix A: Considered options

Note: the options below include police overtime and vehicles costs. Under the existing agreement, such costs are covered by the Police.

Recommended option

<p>Costs per year: £998,000 (plus £5k-£10k overtime contingency per year) 4 teams of 1PS and 5 PCs each (including existing PTF): £852,000 CPDA secondment: £ 60,000 Suggested vehicle cost: £ 86,000 (this will decrease in subsequent years)</p> <p><u>The first year's costs (£998k) will decrease by approximately £74k due to lower vehicle costs in subsequent years.</u></p>
<p>PTF structure – what we get Sergeant (PS): 4 Police Constables (PC): 20 CPDA: 1 Suitable vehicles</p>
<p>Tasking Teams to support Neighbourhood Policing</p> <ul style="list-style-type: none"> • Significant increase on capacity and capability. • Realign the Tasking Unit (incorporating both the existing PTF posts) and new funded officers into 4 separate teams. • Continuing role around ASB, Problem Solving, support for SNTs, and support for a range of Partnership activity and initiatives • Tasking through ASB Ops.Team. • Aligned to clusters and work complementary shift patterns.

Other considered options

Investment of circa £500,000 per annum

Option 1a

Costs per year: £543,000 (plus £5k-£15k overtime contingency per year)

Existing PTF: £213,000
Extra PTF sized team: £213,000
CPDA secondment: £ 60,000
Suggested vehicle cost: £ 57,000 (this will decrease in subsequent years)

The first year's costs (£543k) will decrease by approximately £49K due to lower vehicle costs in subsequent years.

PTF structure – what we get

Sergeant (PS): 2
Police Constables (PC): 10
CPDA: 1
Suitable vehicles

Tasking Teams to support Neighbourhood Policing

- In addition to the existing Partnership Taskforce, a team of 1 PS and 5 PCs
- Increase coverage across a greater number of hours with additional tasking opportunities, including on street prostitution and night duty tasking.
- Require funded vehicle (a Q car) uplift due to additional pressures on vehicle fleet. A Q car is an unmarked Police Vehicle with covert blue lights and sirens. This type of vehicle is ideally suited to plain clothes proactive patrolling and tackling drug dealers in vehicles.

Option 1b

Costs per year (extra 6 Dedicated Ward Officer): £474,000 (plus £2k-£4k overtime contingency per year)

Extra 6 DWOs: £213,000 (existing PTF)
6 ward Constables: £201,000
CPDA secondment: £ 60,000

Costs per year (extra 8 Dedicated Ward Officer): £541,000 (plus £2k-£4k overtime contingency per year)

Extra 8 DWOs: £213,000 (existing PTF)
8 ward Constables: £268,000
CPDA secondment: £ 60,000

Additional Dedicated ward officers for SNTs

- This option is to fund an additional 6 (£201k) or 8 (£268k) Constables per year
- Provide an extra Dedicated Ward Officer (DWO) to our 6/8 busiest wards.
- Spreading the resources thinly. This will dilute the impact.

Investment of circa £1,000,000 per annum

Option 2a

Costs per year: £974,000 (plus £5k-£10k overtime contingency per year) – recommended option in this range.

2 teams of 1PS and 11 PCs each (including existing PTF): £828,000
CPDA secondment: £ 60,000
Suggested vehicle cost: £ 86,000 (this will decrease in subsequent years)

The first year's costs (£974k) will decrease by approximately £74k due to lower vehicle costs in subsequent years.

PTF structure – what we get

Sergeant (PS): 2
Police Constables (PC): 22
CPDA: 1
Suitable vehicles

Tasking Teams to support Neighbourhood Policing

- This option is similar to the recommended option, although this proposes 2 teams (1PS and 11 PC each), rather than 4 teams.
- 2 teams with larger number of PC can be less flexible than the recommended 4 team option.

Option 2b

Costs per year: £1,077,000 (plus £8k-£10k overtime contingency per year)

Extra 6 DWOs: £213,000 (existing PTF)
24 extra ward Constables: £804,000
CPDA secondment: £ 60,000

PTF structure – what we get

DWO: 24
Ward constables: 24
CPDA: 1

Additional Dedicated ward officers for SNTs

- Additional 24 Constables per year to provide an extra DWO across wards in most need.
- Focusing several DWOs in hotspot areas may be more effective rather than allocating one or two DWO to each ward.

Investment of circa £2,000,000 per annum

Option 3a

Costs per year: £2,021,000 (plus £20k-£30k overtime contingency per year)

4 teams of 1 PS and 12 PCs each (including existing PTF): £1,790,000 (existing 1+5 PTF (£213k), additional 3 PSs (£237k), additional 43 PCs (£1.34m))

CPDA secondment: £ 60,000

Suggested vehicle cost: £ 171,000 (including 3 additional marked minibuses)

The first year's costs (£2,021k) will decrease by approximately £148k due to lower vehicle costs in subsequent years.

PTF structure – what we get

Sergeant (PS): 4

Police Constables (PC): 48

CPDA: 1

Suitable vehicles

Tasking Teams to support Neighbourhood Policing

- Significant taskable capability to support the Partnership with the delivery of key objectives around ASB, drugs, violent crime and support partnership enforcement and engagement projects.

Option 3b

Costs per year: £2,010,000 (plus £20k overtime contingency per year)

60 PCs: (£2,010,000)

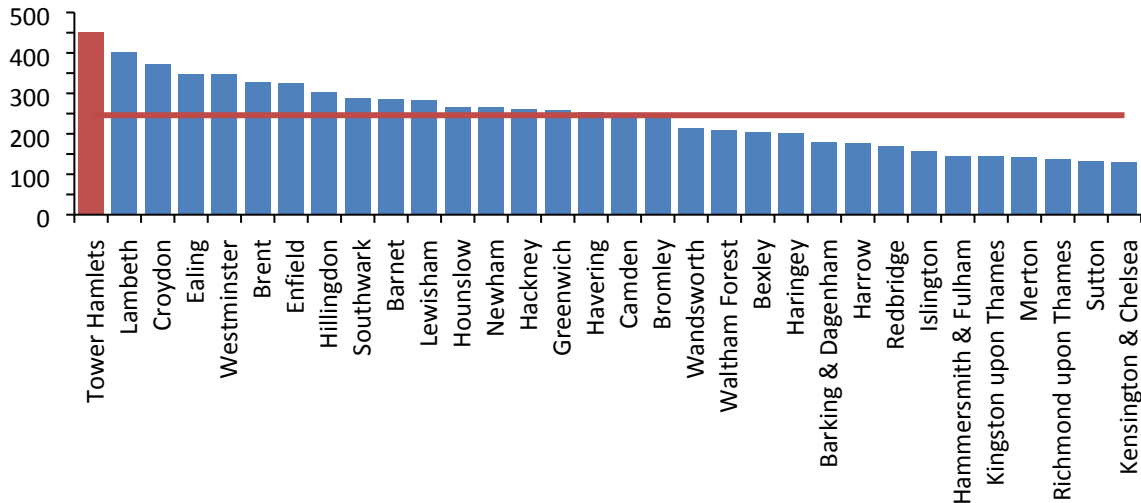
Additional Dedicated ward officers for SNTs

- Extra 60 Constables (£2010000 in year 1 for 30 plus 30 free under the MetPatrol Plus scheme).
- Enough for each ward to get an extra 3 DWO PCs or any number of different combinations across the 20 wards based on demand/risk analysis.
- Significant uplift in Neighbourhood policing capacity, but comes at the expense of an unbalanced tasking capability.

Appendix B: Current Crime Data & Performance

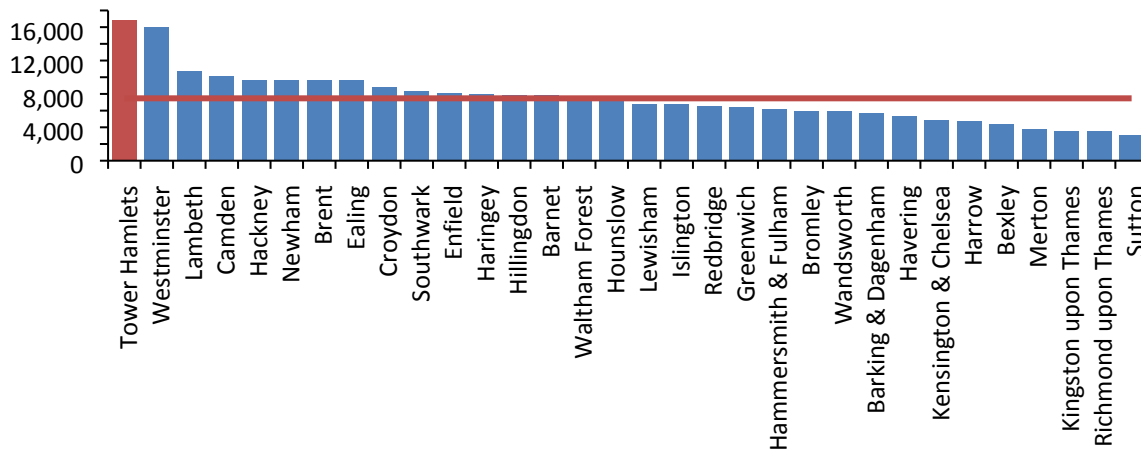
The following performance information was produced by MOPAC in July 2017.

Anti-Social Behaviour Environmental Calls 2016-17



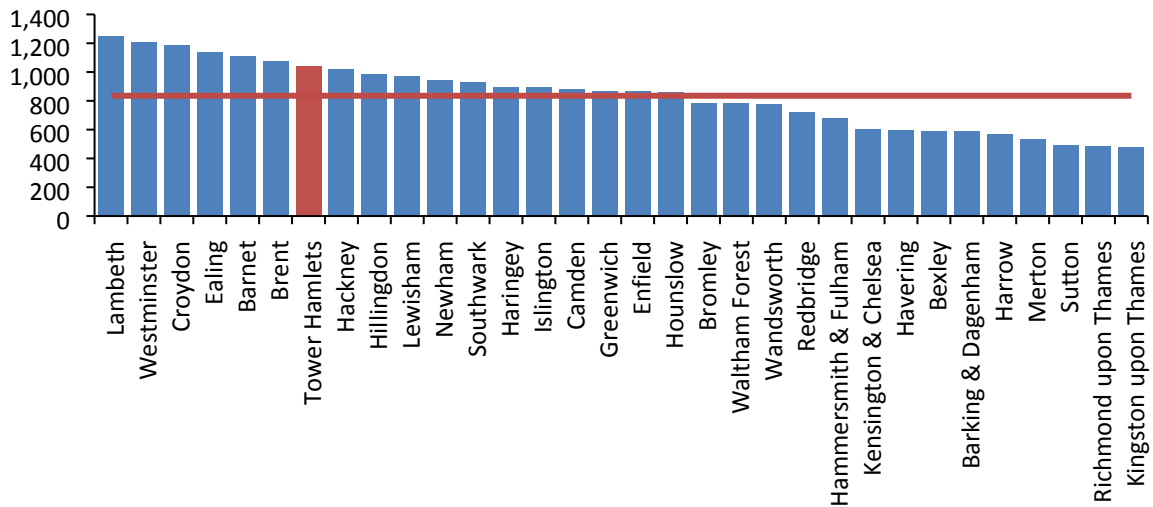
- Tower Hamlets had the highest level of Anti-Social Behaviour calls, that is 200 more than the London borough average.
- Figures varied between inner and outer London boroughs

Anti-Social Behaviour Nuisance Calls 2016-17



- Tower Hamlets and Westminster had significantly higher ASB calls than the rest of other London boroughs, a difference of over 5,000 calls.
- Tower Hamlets had over five times the amount of calls as Sutton which had the lowest.
- The London borough average was over 7,400, more than twice as much as Sutton which was lowest.

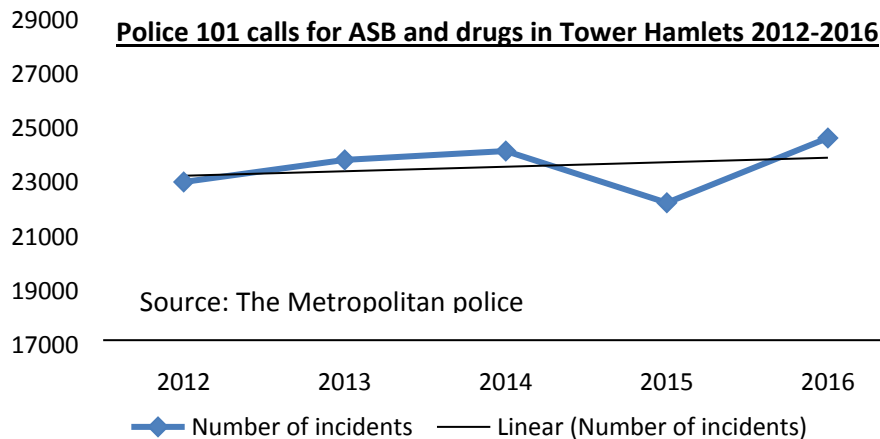
Anti-Social Behaviour Personal Calls 2016-17



- Lambeth and Westminster had the highest recorded ASB calls of all London boroughs.
- Lambeth had double the amount of calls as Kingston, which had the lowest.

ASB Trend

There has been an upward trend of reported ASB incidents in the borough over the last five years and Tower Hamlets was ranked second in terms of ASB incidents among London boroughs between 2012 and 2016.



Violent Crime in the Borough

Tower Hamlets faces a number of crime incidents, especially in the areas of gangs (including knife crime). The tables below show some notable crime incidents in the Borough:

Knife crime with injury (under 25s)

Borough	London Ranking	Rolling 12 Months to April 2017	Rolling 12 Months to April 2016	Rolling 12 months to April 2015
Lambeth	1	137	89	95
Southwark	2	132	82	98
Tower	3	121	93	98

Hamlets				
Croydon	4	105	66	67
Newham	5	104	99	100

Source: MOPAC Gangs Data Dashboard 14.06.17

Gang flagged offences

Borough	London Ranking	Rolling 12 Months to April 2017	Rolling 12 Months to April 2016	Rolling 12 months to April 2015
Greenwich	1	206	85	65
Hackney	2	123	193	191
Tower Hamlets	3	86	207	97
Enfield	4	85	106	108
Lambeth	5	61	101	129

Source: MOPAC Gangs Data Dashboard 14.06.17

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Agenda Item 5.3



Electric Vehicle Charging Point Delivery Plan

London Borough of Tower Hamlets

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1.0 EXECUTIVE SUMMARY

Improving local air quality by reducing emissions from road traffic is a crucial priority for Tower Hamlets. Providing an accessible network of electric vehicle charging points will play a vital role in facilitating the uptake of electric vehicles, which is a necessity to deliver air quality improvements and achieve the Mayor of London's target for a zero emission transport network by 2050.

Electric vehicle ownership in Tower Hamlets is forecast to rise rapidly in the next eight years with an estimated 3500 plus electric vehicles registered to Tower Hamlets residents and businesses by 2025. This represents a huge rise in ownership levels in the borough from just 132 electric vehicles registered at the end of 2016.

With 85% of Tower Hamlets residents without access to off street parking there is a pressing requirement to introduce an accessible range of charging points across the borough to facilitate the growth in electric vehicle ownership. When Transport for London's zero emission capable licensing requirements are introduced for taxis and private hire vehicles (PHVs) from January 2020, the borough will need to provide an accessible charging infrastructure for the large number of taxi and PHV drivers who live here.

A range of electric vehicle charging infrastructures will be required to meet the varied needs of residents and commercial EV users. These will be located in appropriate locations in residential streets, car parks and popular destinations such as High Streets, shopping and leisure centres.

This delivery plan estimates a minimum of 150 accessible charging points will be required to serve the number of electric vehicles located in Tower Hamlets streets by 2025. This would ensure every household is within 500 metres of their nearest charging point. However, the ambition will be to install up to 300 charging points across the borough by 2025.

This document will assist the Council in identifying the most suitable locations and types of charging infrastructure required to encourage electric vehicle uptake and meet growing demand for charging facilities across the borough.

The delivery plan is supported by an evidence base and incorporates latest guidance, providing a robust set of recommendations and actions, which compliment the delivery of the Council's Air Quality Action Plan and vision for a climate-friendly transport future.

2.0 CLIENT REQUIREMENTS

Project Centre Ltd (PCL) has been commissioned by the London Borough of Tower Hamlets (LBTH) to produce a delivery proposal for the installation of electric vehicle charging points (EVCPs) throughout the borough and to assist with the implementation of outputs identified within this document.

The main requirements of the brief were to:

- Review current and projected growth in EV ownership levels across the borough.
- Identify the number, locations and range of EVCP's required to encourage EV take up and meet increasing and varied demands.
- Identify cost neutral funding options for rolling out EVCP networks and partnership delivery.
- Link to LBTH's Air Quality Management Plan and relevant sustainable transport policies including the draft Mayors Transport Strategy 2017.
- Provide an options appraisal of the types of EVCP available and the process for installation.
- Provide a methodology for site identification, incorporating TfL best practice guidance. Addressing challenges associated with installations, such as accessibility, loss of parking spaces and electricity supply.

3.0 INTRODUCTION AND BACKGROUND

Electric vehicles (EVs) and their charging infrastructure are a rapidly evolving technology which has the potential to offer great benefits to London's residents, businesses and visitors, both in terms of health, reduced transport costs and the environment. Uptake of EVs are considered a key tool for decarbonising transport emissions related to climate change and are an essential component for improving local air quality and reducing premature deaths and health risks associated with exposure to toxic air.

Central and Local Government are actively pursuing schemes which will facilitate the adoption of EV's, working in partnership with EV manufacturers, charge point operators and private business.

Demand for EVs has increased exponentially over the last 5 years and is projected to expand rapidly over the next 30 years. It is important that there is sufficient and accessible charging infrastructure to support this transition to low emissions electric vehicles.

The draft Mayors Transport Strategy, 2017 (MTS) contains ambitious plans to make London's transport network zero carbon by 2050, which will deliver essential improvements in air quality. This will require all vehicles to have zero exhaust emissions by that date. To achieve this, there will need to be a complete switch from fossil fuelled (petrol and diesel) vehicles to ultra low emission vehicles (ULEVs), which emit no air pollutants from the exhaust when driven in zero emission mode.

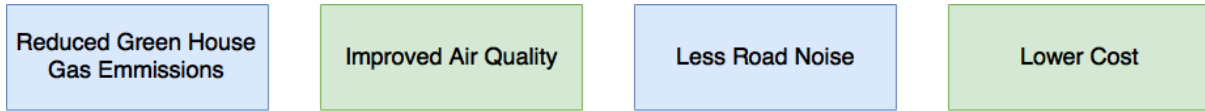
An ULEV is a collective term for all vehicles that can operate with zero exhaust emissions and include battery electric vehicles, plug in hybrid electric vehicles, and range extended electric vehicles. This delivery plan focuses on the infrastructure required to support these electric vehicles, which will be inclusively referred to as EVs throughout this document.

LBTH recognise their role in supporting the uptake of EVs and this delivery plan will provide guidance on identifying the appropriate EVCP infrastructure, located in the right places to support electric vehicle uptake and meet future demand for charging facilities across the borough.

3.1 Policy Context

Air Quality and Sustainable Transport objectives

The primary benefits of EVs are their ability to reduce carbon emissions and to improve air quality.



Air quality

Air quality has become a key issue in recent years as the UK struggles to meet its legal obligations to control levels of pollutants in the air. Since 2000, the whole of Tower Hamlets has been a designated 'Air Quality Management Area' (AQMA) for Nitrogen Dioxide and Particulate Matter.

Currently, motorised road transport is responsible for half of the main air pollutants, with cars contributing around 14% of nitrogen oxides (NOx) and 56% of particulate matter less than 2.5 microns in diameter (PM2.5) emissions – some of the pollutants that are most harmful to human health. EVs offer a solution to this problem as they operate with no tail pipe emissions.

Sustainable Transport

Over the last 15 years, transport planning policies in London have developed a greater emphasis on reducing private car usage through encouraging the use of low carbon, sustainable transport, a modal shift which appears to have had positive impact. According to the GLA, public and active transport now account for 64% of all one-way commuter movements in London.

However, London continues to suffer heavy congestion and deteriorating air quality from the effects of the movement of people, goods and services.

33% of journeys are still being made by private transport (ULEV Delivery Plan, 2015). Tower Hamlets' Local Implementation Plan (LIP) stresses the importance of creating a 'sustainable transport system that contributes to a better quality of life for all who live and work in the borough'.

LBTH's Sustainable Transport Strategy, 'Making Connections', conveys the Council's vision for the development of a transport system that is environmentally, climate and people friendly.

Primarily, in regard to transport, LBTH need to encourage sustainable travel behaviour by:

- Promoting innovative technological change and cleaner vehicles
 - Reducing emissions from public transport and public transport fleets (Bus/Taxi)
 - Using emissions control schemes to reduce emissions from private vehicles
-
- Best Practice from London and elsewhere

The OLEV 'Go Ultra Low City Scheme' (GULCS) scheme has resulted in funding for four exemplar cities to develop innovative EV policies and schemes. London is one of these cities and is also one of the leading European cities for EVs. Oslo, Amsterdam and Paris are also key examples. This research has informed recommendations made in this strategy.

- Future Innovations

EVs and EVCPs are new technologies which are developing rapidly due to high levels of investment from the automotive and other industries. Essentially, the capability of chargers and the size of batteries are expected to improve significantly. In 2017, the speed of commercially available chargers has increased by over 300%. Similarly, the range of vehicles expands year on year.

The transition to EVs will place new demands on the electricity generation and distribution infrastructure across the country. No longer will the petrol station network take the burden of this energy supply. For this reason, 'smart charging' which can manage chargers impact on the grid will emerge as a key technology.

4.0 EV'S IN TOWER HAMLETS - CURRENT SITUATION

4.1 EV Ownership

The latest Department for Transport figures (2016) confirm there are 84,884 electric vehicles registered in the UK. Figure 1, below, shows the steady growth in the numbers of plug-in electric vehicles licensed in the UK from 2011 to 2016. Of the 7,974 vehicles registered in London (Q4 of 2016), only 1.66% (132 vehicles) were from Tower Hamlets.

Figure 1: Registered EV ownership figures

	2011(Q4)	2012(Q4)	2013(Q4)	2014(Q4)	2015(Q4)	2016 (Q4)
Tower Hamlets	16	8	26	46	86	132
London	896	1,042	1,399	2,704	5,015	7,974
UK	2,441	5,040	8,593	22,925	49,331	84,884

Figure 2 graphically represents the growth in EV ownership in Tower Hamlets within the same time frame (2011-2016). Although figures appear to have declined between 2011 and 2012, ownership levels are sixteen times higher in 2016, than they were in 2012. The sharp incline shown in the graph is a positive, and a strategy, in the form of this EVCP delivery plan, is required to ensure adequate charging facilities are installed over the next few years to support the continued growth in EV ownership.

Figure 2 – Rising trend in EV ownership in Tower Hamlets

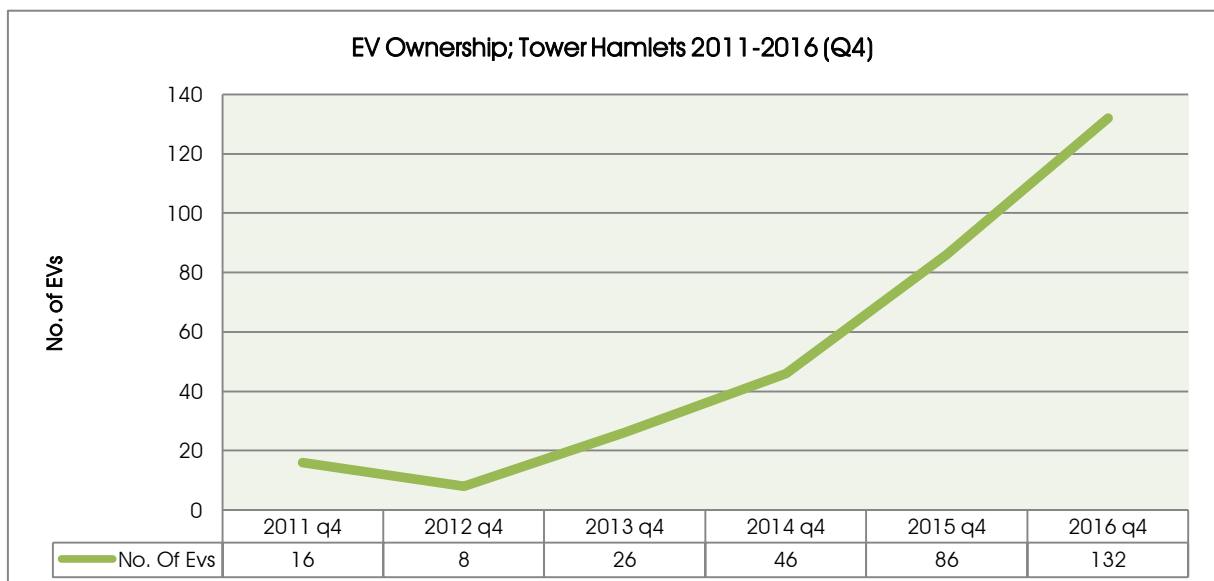


Figure 3, below, shows the number of registered EVs per borough (in 2016). Westminster (691) and Barnet (696) had the highest number of EV's registered, whilst Tower Hamlets (132) had the 8th lowest of all 33 boroughs.

The colour coding in Figure 3 also provides data on the proportion of EVs as a percentage of the total number of registered vehicles in each borough. The 132 EVs in LBTH represent under 0.5% of the total registered vehicle stock in the borough. The boroughs with the highest proportions of EVs in their vehicle stocks were Camden, Westminster, Islington, and Kensington and Chelsea, where EVs made up more than 0.6% of the total vehicle stock. The UK average is 0.24%

Figure 3: Number of registered EV's per borough (Q4, 2016) and proportion of total vehicle stock. (Source: TfL, 2016)

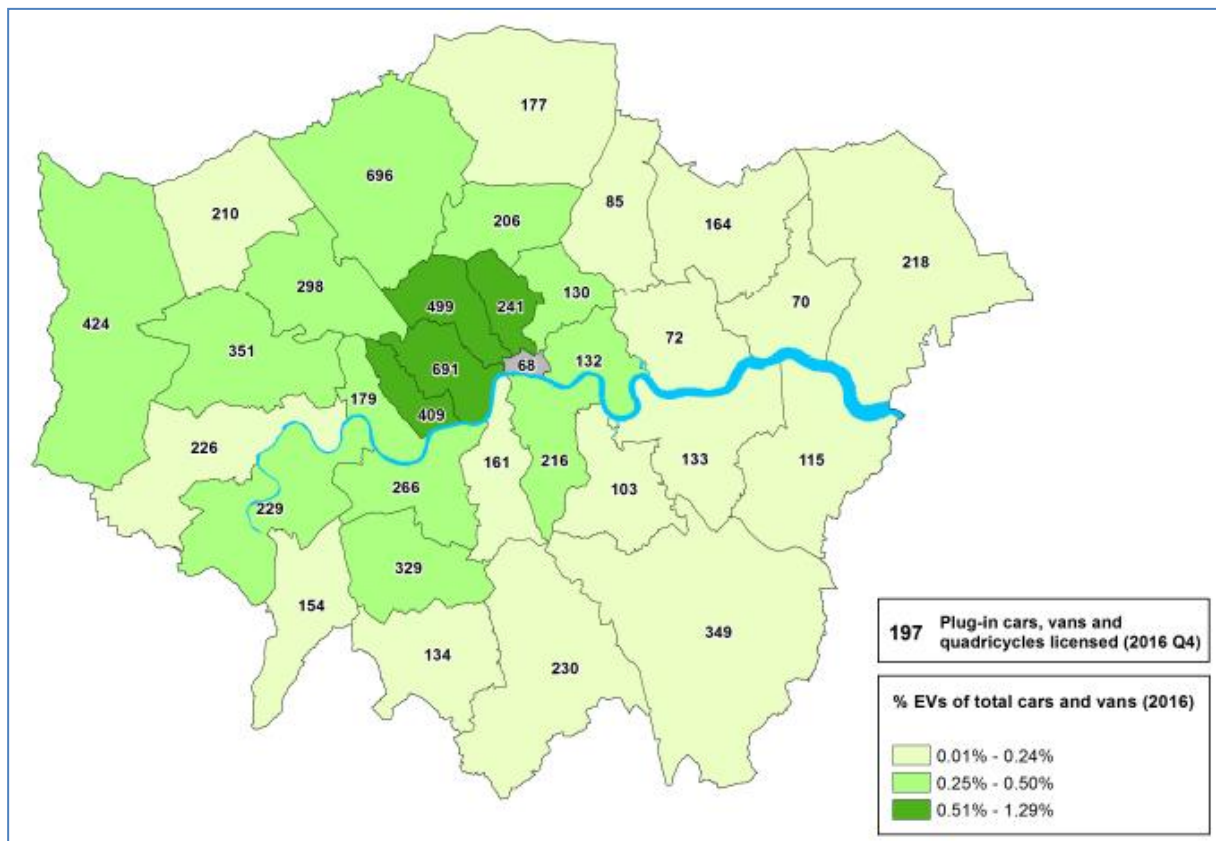
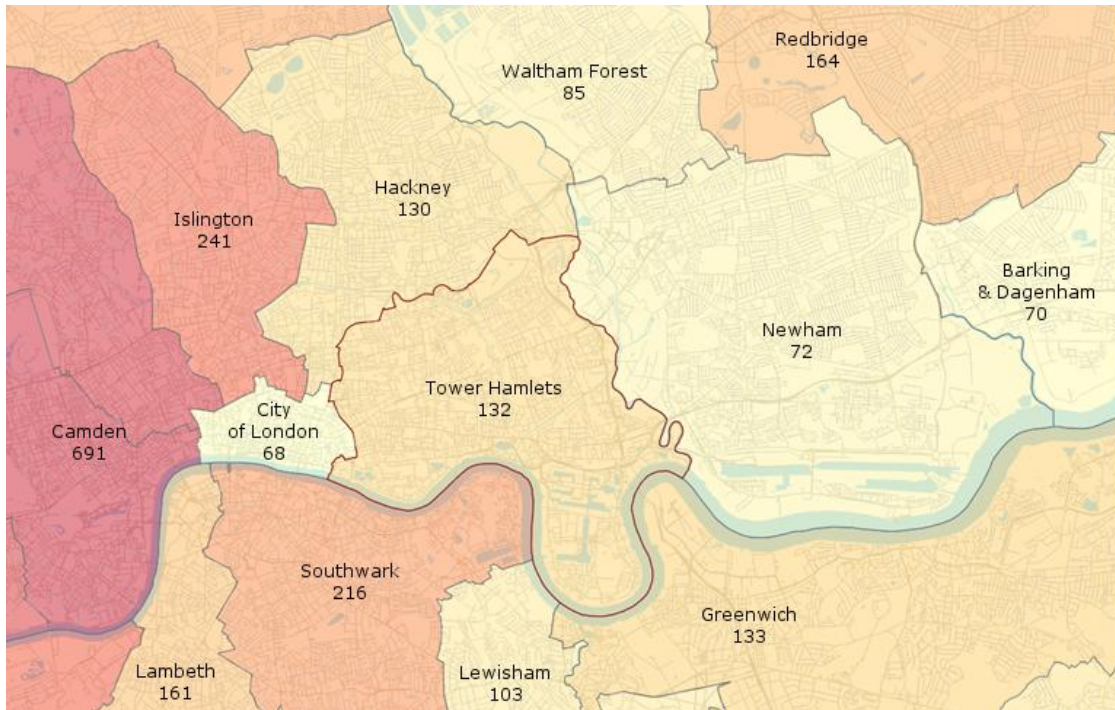


Figure 4 provides a more detailed version of the map shown in Figure 3, depicting the number of EVs within Tower Hamlets and its surrounding neighbours. Camden had the highest number, whilst surprisingly, only 130 EVs were registered in Hackney, despite the roll out of a range of EVCP infrastructure including some of London’s first Rapid Charging installations.

Figure 4: LBTH and surrounding boroughs registered EV ownership gives for Q4, 2016.



4.2 Future EV uptake scenarios

Transport for London (TfL) has modelled scenarios of predicted uptake of EVs by 2020 and 2025.

Figure 5 tabulates this projected uptake of EV’s based on an average (baseline) scenario and a high scenario.

Both scenarios are ambitious and assume that the speed of EV uptake from now until 2025 accelerates from current growth rates. This will require strong policy interventions from both central and local government, of which the Mayors Transport Strategy, the London Plan and the LIP3 delivery plan mechanism will provide important policy and funding support for enabling boroughs to stimulate EV uptake

rates, through the provision of accessible charging infrastructure and incentives.

Figure 5: Projected uptake of EVs based on an average (baseline) and high scenarios. (Source, TfL 2016)

Borough name	Baseline scenario			High scenario		
	2015	2020	2025	2015	2020	2025
Barking and Dagenham	21	309	1,038	21	399	4,210
Barnet	332	2,200	9,215	332	4,741	16,337
Bexley	142	1,128	4,440	142	2,127	10,247
Brent	153	1,208	4,768	153	2,293	8,551
Bromley	119	1,053	4,034	119	1,860	12,677
Camden	131	1,060	4,169	131	1,984	6,151
City of London	16	106	447	16	232	525
Croydon	216	1,661	6,618	216	3,214	13,322
Ealing	157	1,263	4,963	157	2,373	11,270
Enfield	110	966	3,695	110	1,710	10,835
Greenwich	53	444	1,714	53	808	6,065
Hackney	64	536	2,080	64	981	4,018
Hammersmith and Fulham	85	577	2,390	85	1,216	4,615
Haringey	98	716	2,897	98	1,433	6,295
Harrow	153	1,078	4,428	153	2,226	10,718
Havering	67	788	2,777	67	1,162	8,805
Hillingdon	243	1,598	6,764	243	3,469	17,541
Hounslow	78	728	2,741	78	1,235	7,070
Islington	137	916	3,831	137	1,964	5,397
Kensington and Chelsea	127	802	3,431	127	1,794	5,917
Kingston upon Thames	101	716	2,933	101	1,468	7,453
Lambeth	56	476	1,840	56	864	5,098
Lewisham	36	386	1,398	36	599	5,298
Merton	52	506	1,890	52	839	5,105
Newham	31	311	1,136	31	501	4,157
Redbridge	173	1,208	4,970	173	2,506	11,261
Richmond upon Thames	276	1,719	7,372	276	3,872	11,839
Southwark	48	435	1,654	48	758	3,636
Sutton	79	688	2,648	79	1,224	8,103
Tower Hamlets	123	871	3,553	123	1,784	5,567
Waltham Forest	71	650	2,457	71	1,117	6,512
Wandsworth	195	1,310	5,460	195	2,793	10,022
Westminster	204	1,314	5,593	204	2,893	7,832

The projected EV uptake figures for LBTH indicate a rapid rise in registered EVs by 2025. Even the more reserved baseline estimate predicts 3553 EVs (a 2700% increase on the 132 EV currently registered) parked in the borough by 2025. The actual figure could be even higher if the high scenario uptake estimate of 5567 is achieved. To ensure these forecasts can be accommodated, a substantial charging infrastructure installation programme needs to be rolled out across the borough, as a priority.

Further analysis of the EV uptake forecasts for Tower Hamlets, and how this translates into future demand for EVCP's, is provided in the Recommendations and Action Plan sections of this Delivery Plan.



4.3 Existing EVCPs in Tower Hamlets

There are currently EVCPs operating at eleven locations within LBTH, detailed in Figure 6 and 7. However they are all operated on private property and therefore not entirely publically accessible. They are located in a mixture of hotels, supermarkets, and shopping centre car parks with tariffs, with the majority concentrated in the Canary Wharf area. Overall, there is very little publically accessible EVCP provision within the borough which suggests the majority of current EV users registered in LBTH either have access to off-street charging facilities or travel out of the borough to charge.

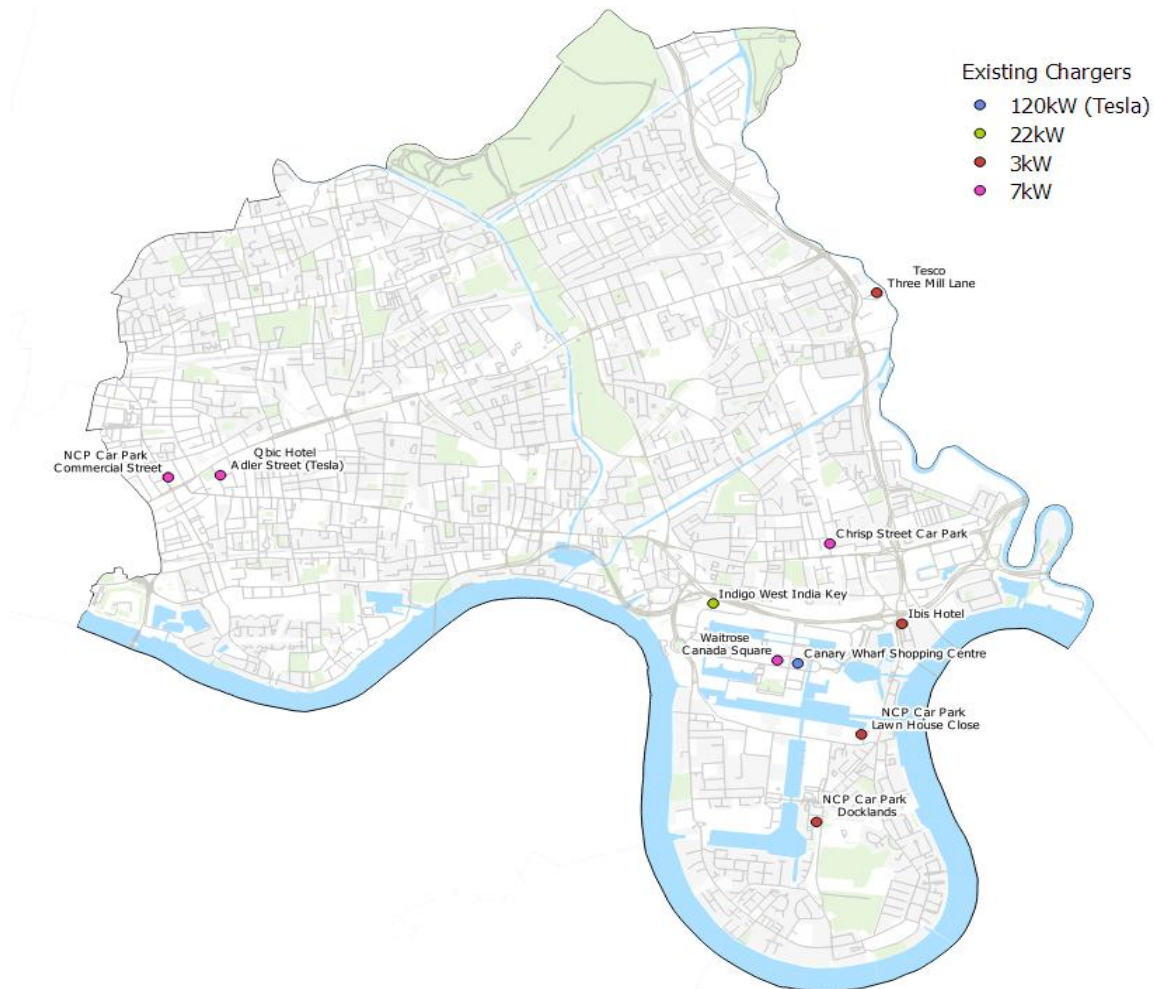
Figure 6: Existing Charge Point locations and tariffs in Tower Hamlets

Location	Post Code	Supplier	Location Type	Costs	Additional Information
NCP Car Park, Docklands	E14 9GL	Chargemaster, 3kW	Public Car Park; 1 device	Legacy Source London point; Free to Use POLAR Plus; Free to Use POLAR Instant; £1.20 connection fee only	Parking charges may apply
NCP Car Park, Lawn House Close	E14 9YQ	Chargemaster, 3kW	Public Car Park; 1 device	Legacy Source London point; Free to Use POLAR Plus; Free to Use POLAR Instant; £1.20 connection fee only	Parking charges may apply
Canary Wharf Shopping Centre (Tesla)	E14 5EW	Tesla, 120kW	Retail Car Park; 4 devices	Free for Tesla drivers	Parking charges May apply
Canary Wharf Shopping Centre	E14 5EW	Chargemaster 7kw	Public Car Park; 14 devices	POLAR - Plus: Free to use; Instant: £1.20 connection fee	Parking charges May apply
NCP Car Park, Commercial Street	E1 7PE	Chargemaster, 7kW	Public Car Park; 2 devices	Legacy Source London point - free to use; POLAR - Plus: Free to use; Instant: £1.20 connection fee only	Parking charges may apply
Waitrose, Canada Square	E14 5EW	Chargemaster, 7kW	Retail Car Park; 7 devices	POLAR PLUS Subscription: RFID Card - £7.85/month. POLAR INSTANT PAYG App – Min £20 balance to start. POLAR PLUS – free to use or 10.8p/kWh	Parking charges may apply £200/year
Ibis Hotel	E14 9PE	Chargemaster,	Hotel; 1	POLAR Plus; Free to Use	N/A

		3kW	device	POLAR Instant; £1.20 connection fee only	
Indigo West India Key, (Tesla)	E14 4AN	Tesla, 22kW	Hotel; 1 device	Free to use for customers	N/A
Chrip Street Car Park	E14 6LL	Chargemaster, 7kW	Public Car Park; 2 devices	POLAR Plus RFID Card – Free to Use or £1.20 connection fee only via the app	Carpool members only
Tesco, Three Mill Lane	E3 3DA	Elektromotive, 3kW	Retail Car Park; 1 device		Parking charges may apply
Qbic Hotel, Adler Street (Tesla)	E1 1EE	Tesla, 7kW	Hotel Car Park; 1 device	Free to use for customers	N/A

The locations of these existing charging points in Tower Hamlets are shown in Figure 7 below.

Figure 7: Existing Charge Point locations in Tower Hamlets

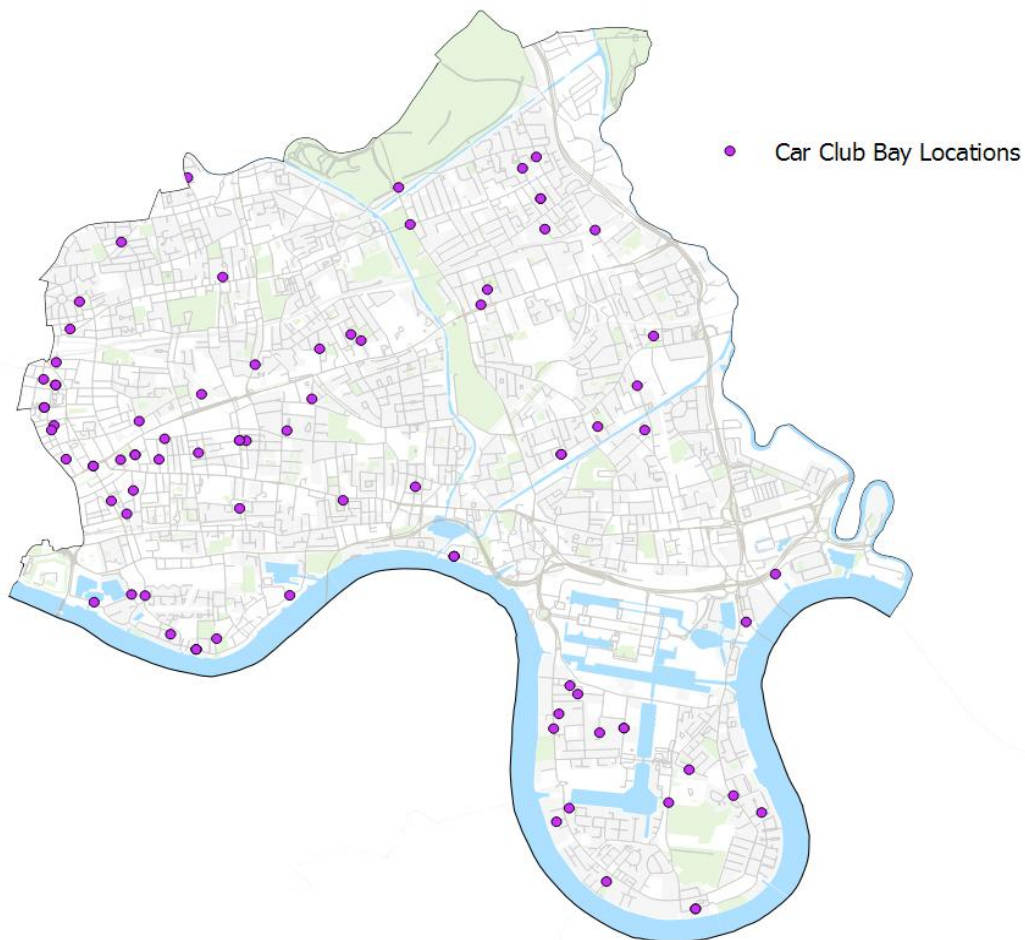


4.4 Car Clubs in Tower Hamlets

Car club services provide an alternative to private car ownership, helping reduce pressure on kerbside parking space, reduce car dependency and unnecessary car use. Car club fleets are usually under one year old and less polluting than most privately owned vehicles. Diesel vehicles have been removed from the vast majority of fleets and an increasing number of operators, including Zipcar and the DriveNow flexible service, offer access to EVs which, in addition to reducing emissions, increases public awareness of EVs and helps 'normalise' their everyday use.

There are currently 126 car club bays within LBTH at 86 separate locations, highlighted by Figure 8, which are utilised by two car club operators: ZipCar and Enterprise City Cars. In addition, E-Car club also operates EVs from two off-street locations: Chrisp Street car park and from the Guerin Square car park on Coborn Road.

Figure 8. Car club locations in Tower Hamlets.



4.4.1 Flexible ULEV car sharing services

Zipcar are soon to offer their customers in Tower Hamlets flexible car club services, similar to the current DriveNow flexible service operating in other parts of London. This will enable Zipcar customers to either return their vehicles to a designated car club parking bay or leave the vehicle elsewhere within the operating area for one-way journeys. Zipcar are planning to introduce the service in Tower Hamlets by the end of 2017 and the fleet will consist of 30-40% EVs, supported by a network of rapid charging facilities located in off-street locations. Providing access to an accessible EVCP network throughout the borough will enable all car club operators to convert larger numbers of their fleets to EVs.

TfL's ULEV Delivery Plan has a target for at least 50% of car club fleets in London to be electric by 2025 and acknowledges car club services have great potential to introduce drivers to EVs and encourage them to switch from fuel and diesel fuelled vehicles.

The majority of LBTH's 126 car club parking bays can be converted by installing fast chargers, which would give the car club EV a top-up charge in between customer bookings and would fully recharge vehicles within 3 hours. These could either be floor standing chargers or via lamp post charging technology if a suitable post could be upgraded to accommodate fast charging capabilities. The benefit of lamp post charging is the lower installation cost and flexibility to move the units if required, however most suitable lamp posts can only accommodate the slower standard charging infrastructure and are yet to be tested in a real car club operating scenario.

LBTH will need to support the expansion of car clubs and identify suitable car club parking bays where EV charging infrastructure can be installed for EV car club fleets. Further details regarding opportunities to electrify car club fleets are provided in the Recommendations and Action Plan section.

5.0 POLICY CONTEXT

5.1 LBTH Air Quality Action Plan 2017-2022

LBTH's Air Quality Action Plan (AQAP) outlines what the Council aims to deliver over the five year period (2017-2022), to improve local air quality by reducing concentrations of pollutants and exposure to pollution.

The plan highlights the biggest source of air pollution in the borough, 53%, is from road traffic emissions. The remaining emissions originate from construction machinery, river traffic and aviation.

Worryingly, around 40% of Tower Hamlets residents live in areas with unacceptable air quality, with 37 Primary Schools and 11 Secondary Schools located in areas where air pollution exceeds legal limits. Studies, including one carried out in Tower Hamlets, have shown that children's health is being negatively affected living in highly polluted areas. Therefore, urgent action is required to reduce emissions and exposure to toxic air.

To do this, the AQAP contains the following objectives which make direct reference to the need to support the uptake of EVs.

- Increased usage of low emissions transport by installing EVCPs
- Greater engagement and awareness with businesses and schools to help reduce their own impact on air pollution
- Ensuring new developments across the borough do not adversely impact the local air quality – use planning systems to ensure charging points are provided where parking is offered, and ensure residents have access to a ULEV car club.

The AQAP actions are grouped into 9 themes. Figure 9 summarises the AQAP actions which directly support the measures identified within this EVCP Delivery Plan.

Figure 9. AQAP actions with direct link to the EVCP Delivery Plan.

AQAP Theme	Why	Action / link with EVCP Delivery Plan
Delivery servicing and freight	Vehicles delivering goods and services are usually light and heavy duty diesel-fuelled vehicles with high primary NO2 emissions.	Use the procurement process to encourage sustainable logistics for deliveries. Review freight consolidation of deliveries.
Borough fleet/contracted fleet actions	LBTH uses 200 fleet vehicles, mostly diesel. Need to replace with ULEV and lead by example to reduce emissions.	Increase no. of EVs in fleet Ensure LBTH contractors (e.g waste collection) use as cleaner vehicles as possible. Procurement: Insert requirement for ULEZ fleets in future contracts.
Localised solutions	LENs and ZEN. Reduce vehicle emissions in targets pollution hotspots to improve the environment of neighbourhoods.	Zero Emissions Network (ZEN) business engagement to take up EV fleets for deliveries and serving with provision of EVCPs. Low Emissions Neighbourhood LENs) installing EVCPs and priority access for EVs.
Cleaner transport	Increasing proportion of EVs in car club fleets	Electrification of car club bays and fleets
Cleaner transport	Transport accounts for over half (53%) the pollution emissions in the borough.	Encourage low emissions travel by installing public electric vehicle charge points, both residential and rapids for taxis and commercial fleets. Review parking charges to incentivise EVs, based on emissions.
Lobbying and partnership working	Air pollution is a complex issue. There needs to be a coordinated approach from all stakeholders.	Work with TfL to ensure the Inner London ULEZ for all non compliant vehicles is introduced by 2021. Lobby TfL for ULEV bus fleets operating in Tower Hamlets. Engage with policy makers to ensure policies adequately address the issue of air quality.

Figures 10 and Figure 11 show the variations in concentrations of the pollutants of concern, NO₂, PM₁₀ & PM_{2.5}, across the borough. Figures 12 and 13 highlight the traffic sources of these pollutants.

Figure 10. NO₂ emissions in Tower Hamlets. Source GLA (2013)

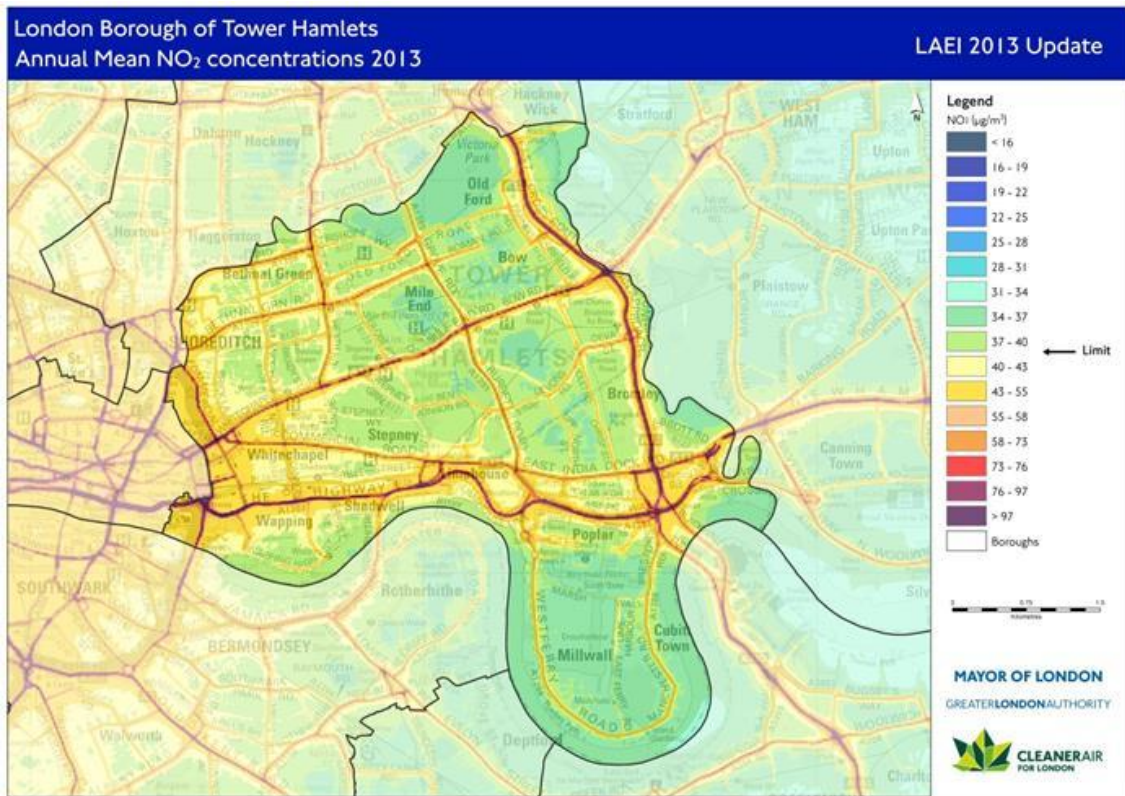
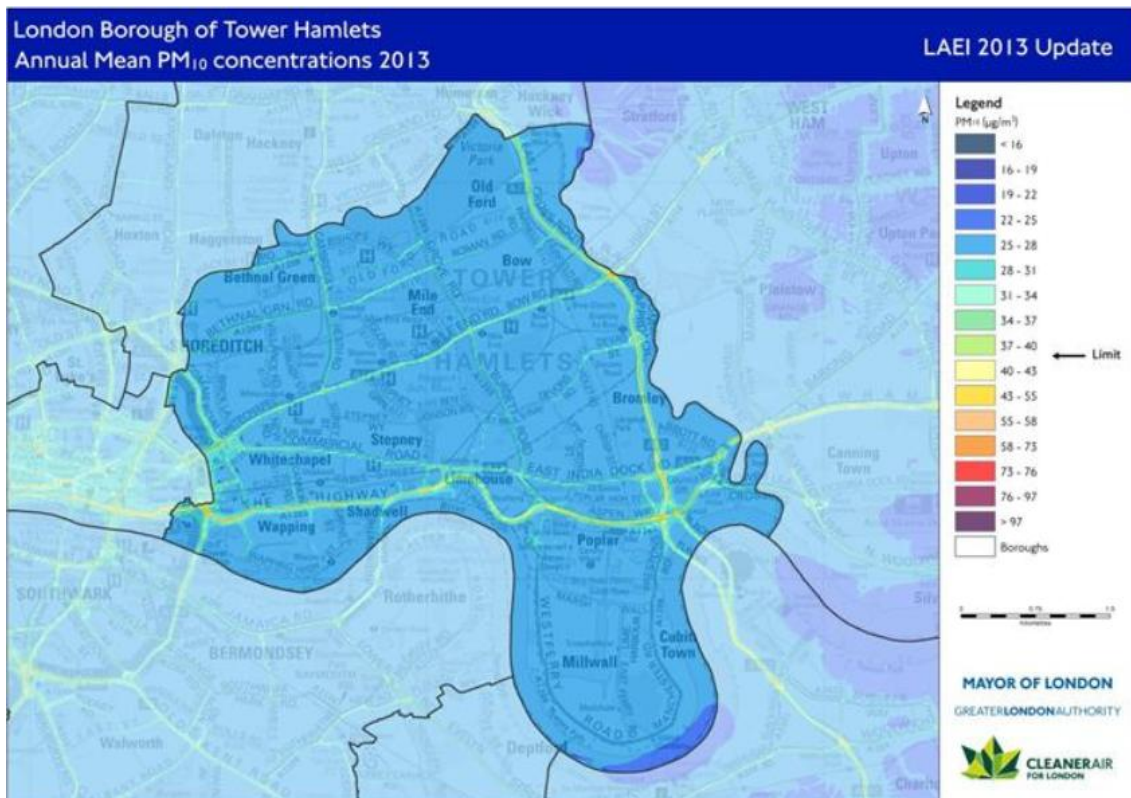


Figure 11. PM₁₀ emissions in Tower Hamlets. Source GLA (2013)



The NO₂ and PM₁₀ pollution hotspots are unsurprisingly along the main road networks through the borough, in Aldgate, Limehouse and Bromley-by-Bow. However, higher NO₂ levels appear to effect larger areas of the borough.

Figure 12 displays the main transport source of NO₂ with diesel vehicles, vans and mini buses, large HGV's, TfL buses being the main emitters. Petrol cars only account for 10%.

Figure 12. NO₂ emissions from road transport in Tower Hamlets.

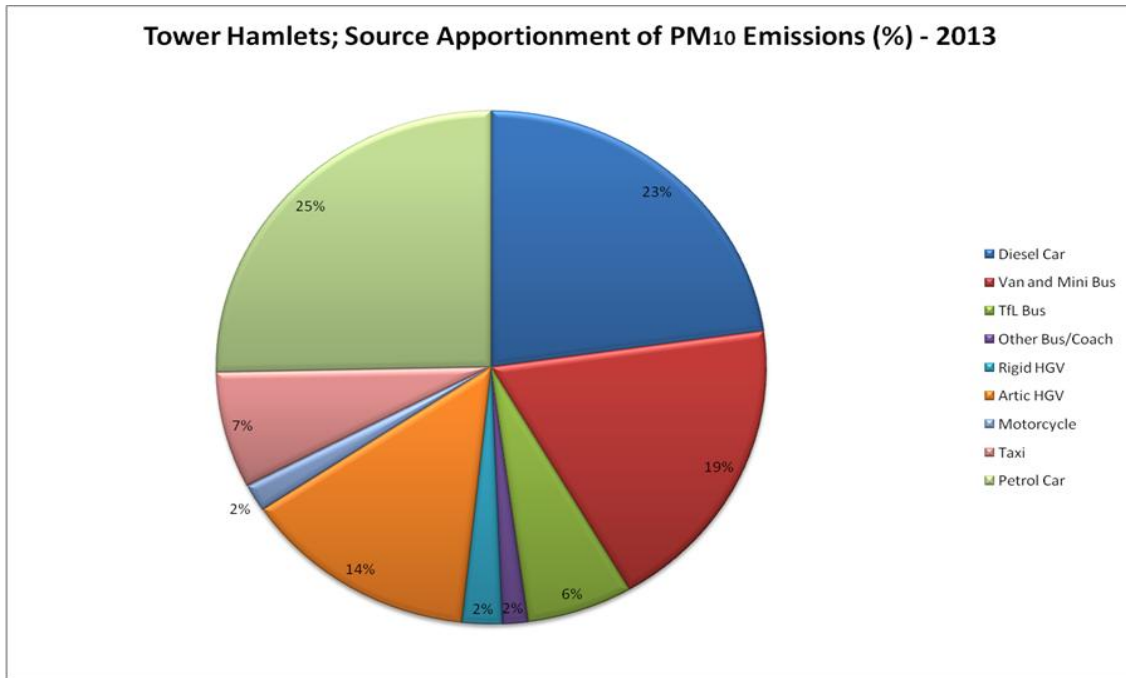
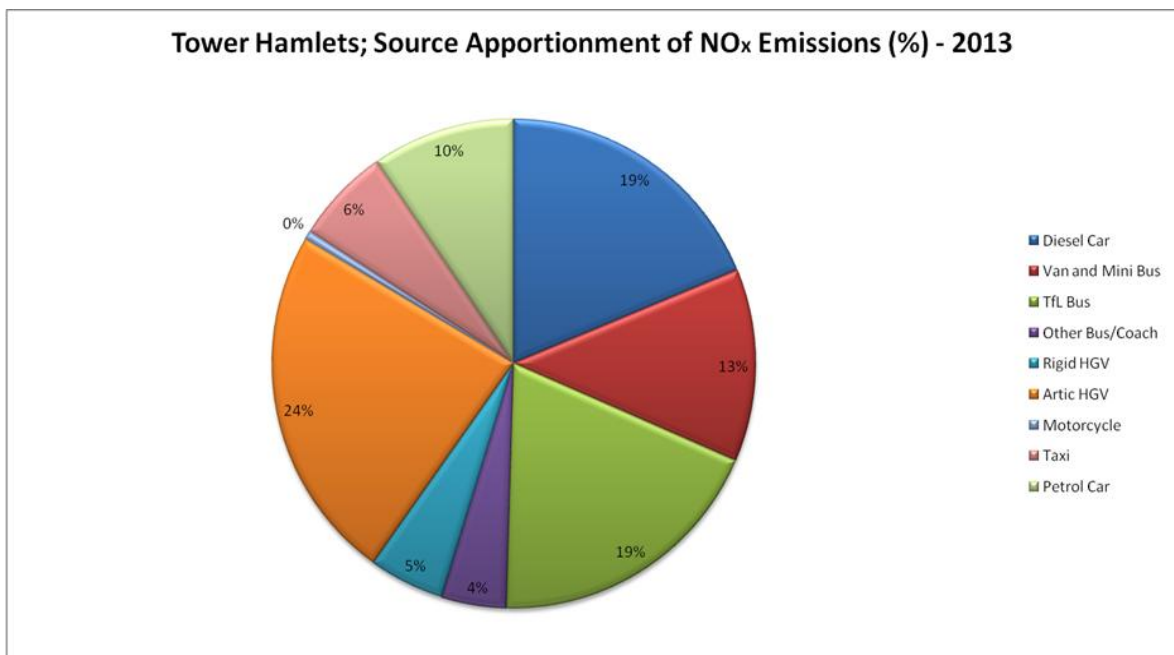


Figure 13 displays the main PM₂ emissions from road transport in Tower Hamlets. Petrol cars are the largest emitters, followed by diesels, vans and mini buses and large HGVs.

Figure 13: PM₁₀ emissions from road transport in Tower Hamlets.



5.2 Tower Hamlets Local Implementation Plan (LIP), 2011-31

The document informs the basis of future transport and highways capital investment aimed at delivering local priorities and the objectives of the Mayor of London's Transport Strategy.

The core LBTH Borough Transport Objectives were set as:

Objectives

- To promote a transport environment that encourages sustainable travel choices for all
- To ensure the transport system is efficient and reliable in meeting the present and future needs of the borough's population
- To ensure the transport system is efficient and reliable in meeting the present and future needs of the borough's population and economy
- To reduce the impact of transport on the environment and wellbeing
- To encourage smarter travel behaviour

Concerns

- Tower Hamlets produces the second largest amount of CO₂ of the 33 local authorities in London, of which only 14% comes from transport sources
- Traffic flows have steadily increased within Tower Hamlets over recent years
- Approximately 1000 additional parking spaces are being provided each year associated with new development

Solutions

- Encouragement of carbon-efficient travel behaviour, improving operational efficiency of the highways network and managing travel demand
- Encouraging the switch from conventional combustion engine vehicles to alternative technologies
- Promote and maximise the sustainable, safe, reliable and efficient movement of freight by water, rail, electric vehicles and cycle deliveries. This will help to relieve pressure on the strategic road network
- Support the use of taxis by incorporating taxi ranks as part of public realm and streetscene improvement schemes and consider electric taxis
- Utilise the strong Car Club presence already in Tower Hamlets to further expand the Electric Vehicle Charging programme, through encouraging Operators to trial electric vehicles and charging points to their network

- Cleaner Council vehicles fleet
- Electric Vehicle Charging Programme – provide charge points, especially within the Clean Zone area and in workplaces and encourage private land owners to sign up to the TfL Electric Vehicle plan.

5.2.1 LIP3

A revised long term Borough LIP (LIP 3) will be drafted for implementation from April 2019. The new draft Mayor's Transport Strategy and draft LIP3 guidance has been circulated and the final guidance will be issued in February 2018. Further details regarding policy content in the MTS3 in relation to EVs is covered later in this section.

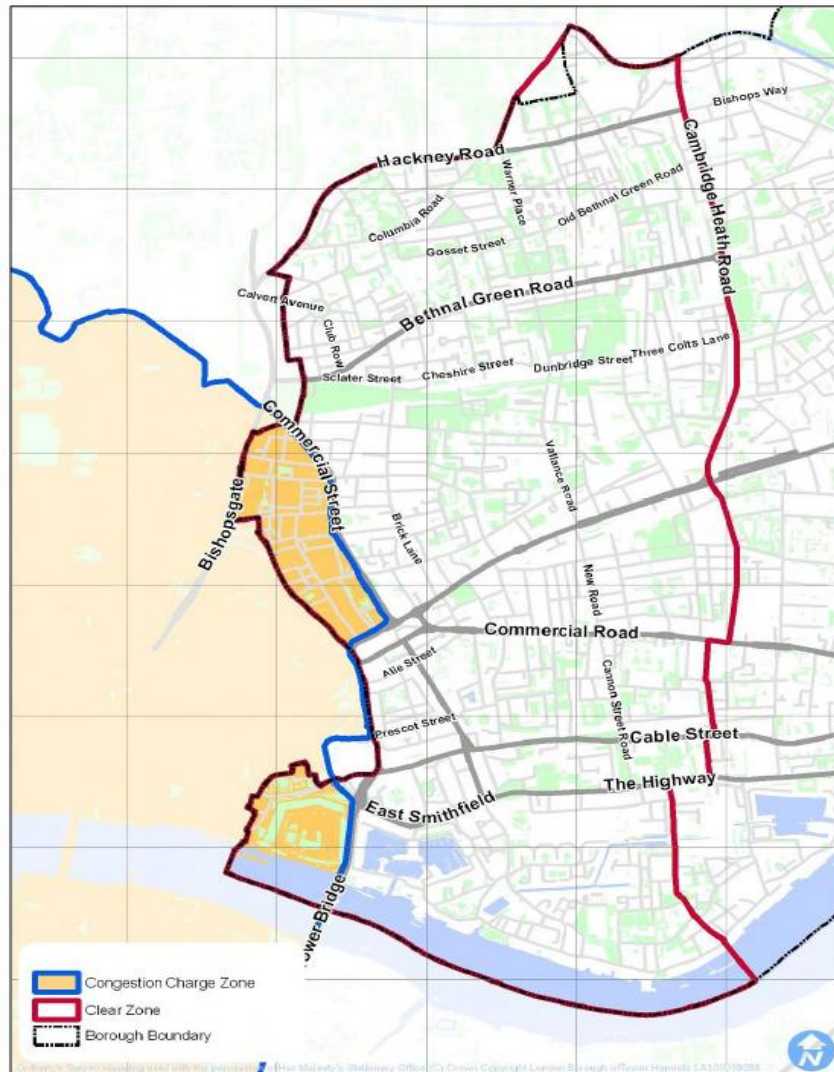
5.3 Tower Hamlets Clear Zone Plan – 2010-2025

Tower Hamlets is declared an Air Quality Management Area due to the high concentration of NO_x and PM₁₀ caused largely by traffic on major roads in the borough, as shown in Figures 10 and 11. The hotspots in Tower Hamlets are found in Aldgate, Limehouse and Bromley-by-Bow. Interventions to reduce the sources of air pollution from transport are focussed on reducing the use of polluting vehicles, including encouraging the use of EV's.

The Clear Zone largely consists of high density residential districts and includes the busy commercial areas along Whitechapel Road and Bethnal Green Road as well as the popular leisure destinations of Spitalfields Market and the Brick Lane area.

The Clear Zone covers an area of approximately 9km² in the west of the borough as shown in Figure 14.

Figure 14: The clear zone boundaries



5.3.1 New Technology

The overarching objective in the Clean Zone Plan is to reduce pollutant emissions. The measures described support use of cleaner vehicles and the removal of pollution from the air.

As Tower Hamlets moves towards becoming an 'Electric Vehicle Borough', the Clear Zone will be an area where innovation is encouraged and new approaches supported.

The Clear Zone will promote adoption of EVs by having a network of publicly accessible EVCPs.

5.3.2 Electric Vehicle Hub

A short term plan is to deliver a high concentration of charging points; six points in one square to create a 'mini hub' of charging points. The location selected will reflect TfL's research on the demographics of early owners of EVs.

5.3.4 Electric Vehicle Car Club Network

Given the strong Car Club presence already in Tower Hamlets and the Clear Zone, there is an opportunity to work with the Car Clubs to introduce EVs and their respective charging points on to their networks. The Clear Zone plan outlines that an electric van club would be formed for local businesses within the Clear Zone. The initial location for the van club would be based upon consultation with local business groups, but potential locations were Brick Lane and Whitechapel Road.

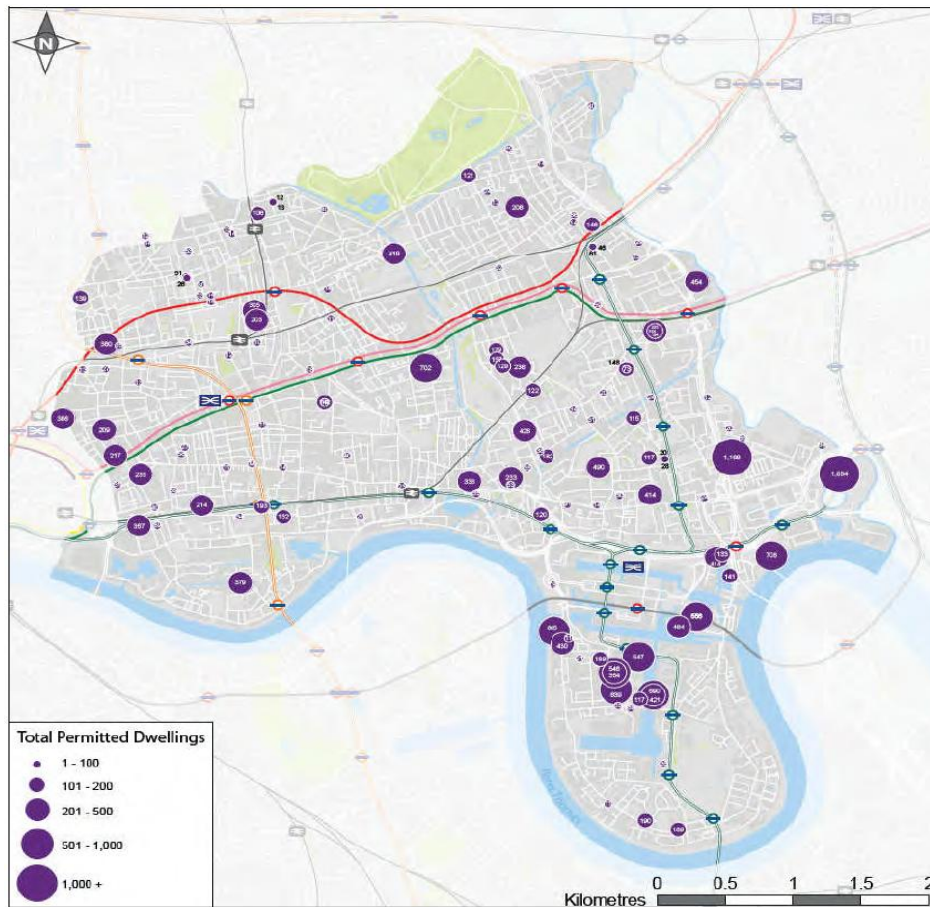
5.3.5 Local Low Emission Zone

Emissions control schemes can drive the uptake of cleaner vehicles, using charging as a tool to enforce higher emissions standards.

5.4 Promoting EV use in new residential developments

The London Plan requires residential developments with off-street parking provision to be provided with 20% active provision plus 20% passive provision for EV charging facilities. Figure 15 pinpoints areas of residential development within the borough where EVCP provision made be required. Although these EVCPs would be on private property and are therefore not publically accessible, their presence may encourage new residents to purchase an EV.

Figure 15: Sites of residential development in Tower Hamlets where off street EVCP may be required as part of the planning consent.



5.5 Mayor’s Draft Transport Strategy, 2017 (MTS3)

Three key themes are at the heart of the strategy.

1. Healthy Streets and healthy people

Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.

2. A good public transport experience

Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London’s streets.

3. New homes and jobs

More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.

5.5.1 Healthy Streets Concept

The MTS3 introduces the concept of healthy streets and suggests that streets make up 80% of the city’s public space.

There are 10 components of the healthy streets agenda, as shown in Figure 16, two of which directly relate to EVs; improving air quality and reducing traffic noise. EVs would contribute to achieving both of these goals within LBTH and across the city.

The Healthy Streets Approach provides a structure for placing human health and experience at the centre of planning the city and recognises improving air quality benefits everyone and reduces unfair health inequalities.

Figure 16. 10 Healthy Streets Indicators



5.5.2 Transport Emissions

London must meet legal pollution limits, sooner rather than later. This requires an earlier introduction and expansion of the Ultra Low Emission Zone (ULEZ) and making sure public services lead the way. The Mayor's aims are:

- For all taxis and Private Hire Vehicles (PHVs) to be zero emission capable by 2033
- For all buses to be zero emission by 2037 and to introduce low emission bus zones
- For all new road vehicles driven in London to be zero emission by 2040
- For London's entire transport system to be zero emission by 2050
- Introduce the ULEZ for central London in 2019. Expand to the North and South Circular for non compliant HGV's, Coaches and Buses by 2020.
- Introduce all non-compliant ULEZ for inner London; including Tower Hamlets by 2021 (see Figure 17 below).

5.5.3 Freight

The MTS emphasises that if unchanged, freight traffic in the central London morning peak is expected to increase by up to 10% in the next ten years. In order to keep London's streets operating efficiently, the Mayor intends to:

- Reduce freight traffic in the central London morning peak by 10% on current levels by 2026
- Reduce total London traffic by 10-15% by 2041

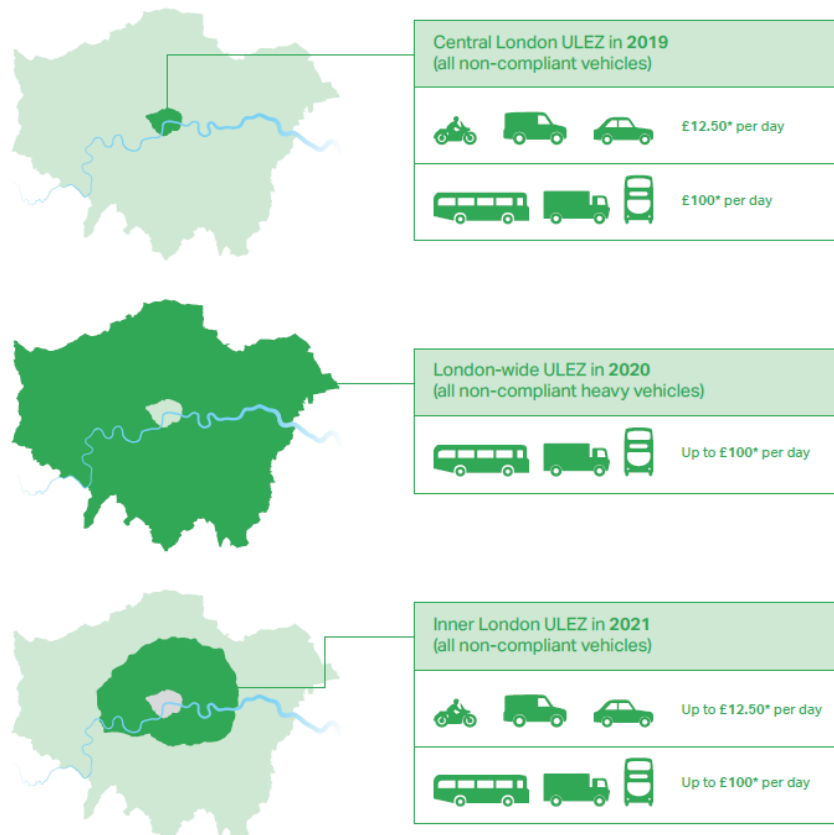
5.5.4 Policies & Proposals

The Mayor will endeavour to reduce emissions on London's streets and attempt to ensure London is compliant with EU legal limits. This includes promoting the shift to EV and promoting electrification.

Outlined below are policies and proposals proposed in the MTS which would directly correlate with EVs.

Schemes including the Congestion Charge, Low Emission Zone and Ultra Low Emission Zones (ULEZ) will remain and be reviewed through TfL.

Figure 17. ULEZ expansion proposals.

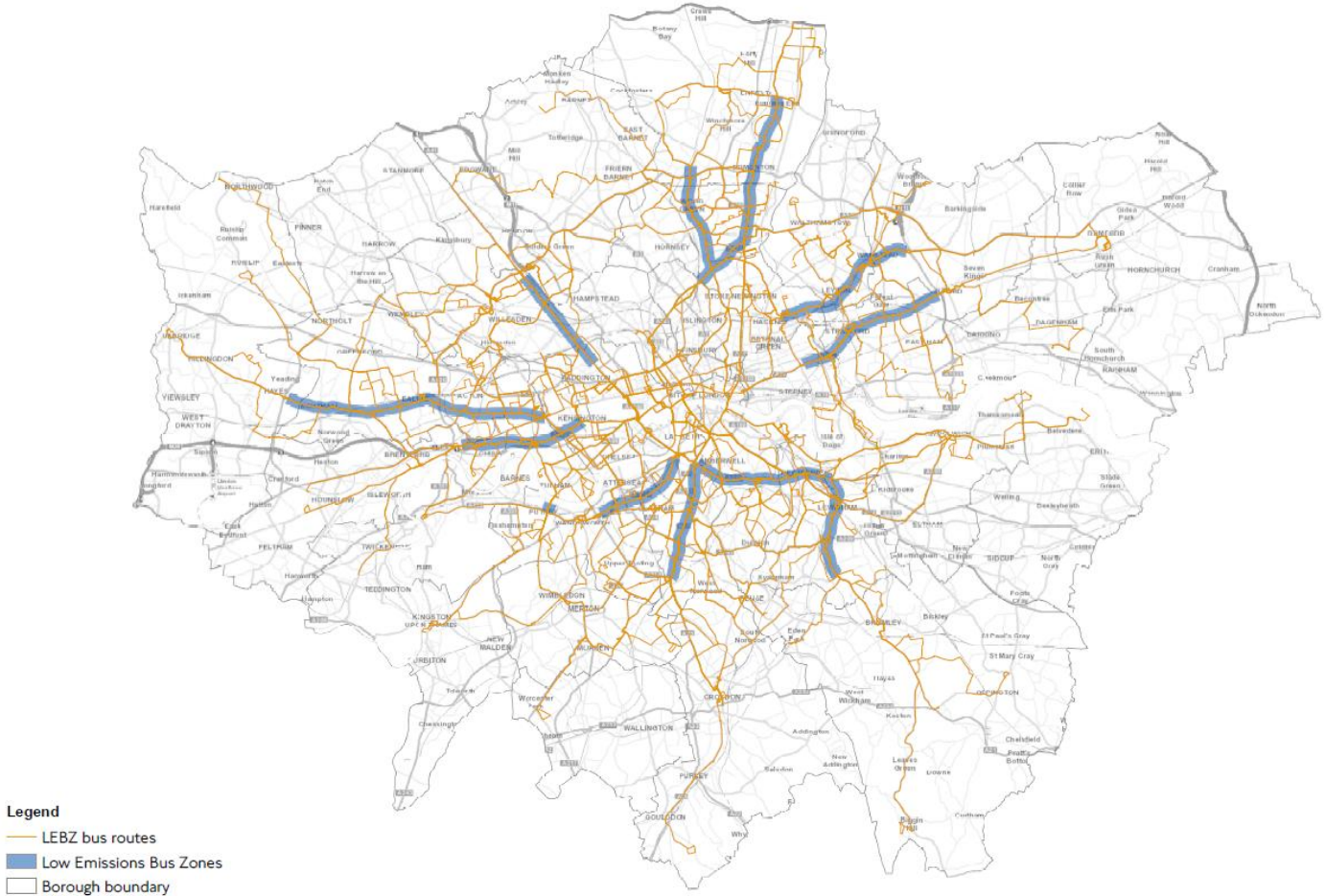


The Mayor will seek to introduce the central London Ultra Low Emission Zone standards and charges in 2019; the zone would be expanded London-wide for heavy vehicles by 2020 and to inner London for all other vehicles (except taxis) by 2021.

All TfL buses will need to meet the Euro VI diesel standards for NO_x and PM by 2020. This will require the acceleration of the uptake of EVs and ensuring charging infrastructure is in place.

12 low emission bus zones will be introduced where low emission bus fleets will operate along all routes in those corridors. One of the low emission bus zones included part of Tower Hamlets, as shown in Figure 18 below.

Figure 18. The 12 low emission bus zones.



TfL indicate that London’s public transport fleet could be fully zero emission by 2037, however more work is required to meet this target through the uptake of hybrid and electric technologies.

The Mayor proposes that the Government amends fiscal incentives, including vehicle excise duty, so that only the cleanest vehicles are incentivised for purchase; and implements a national diesel vehicle scrappage fund to enable cities to take the most polluting vehicles off their streets.

5.6 Modern Transport Bill

The Modern Transport bill is currently under consultation and will be debated in

parliament this year. It aims to aid the uptake of ULEVs which is key if the UK is to meet its goal of all new light vehicles being ULEVs by 2040, meet its legal carbon emission requirements and meet its air quality targets and reduce carbon emissions. It also aims to support the UK's automotive industry.

The bill aims to improve the provision of EV infrastructure in three ways:

1. Improve the public charge point user experience

- Improve the charge point user experience which is currently a barrier to adoption
- A public open database of all charge point locations and availability
- Universal standards that will create interoperability between all chargers on the network
- Open access to all chargers so that users do not require multiple memberships

2. Require chargers at motorway services and large petrol stations

- Enable long distance travel by ensuring rapid chargers at service stations and to expand the network by requiring minimum EV provision at large petrol stations

3. Smart charging

- Ensure all chargers have 'smart' capability which allows them to communicate with the grid and thus demand on the electricity grid to be dynamically managed

5.7 The Transport Emissions Roadmap

The Transport Emissions Roadmap (TERM) was published in September 2014. It looks at how to reduce emissions from transport in London and reports on what we have already done and what we may do in the future. It provides a range of possible new measures that the Mayor, TfL, the London boroughs, the government, the EU and other parties should consider to help meet the challenge of reducing air pollutants and CO2 emissions in London. These measures include:

- Implementing an Ultra Low Emission Zone (ULEZ) in central London
- Tightening the Low Emission Zone
- Making traffic management and regulation smarter
- Helping Londoners tackle air pollution and climate change
- Driving the uptake of Low Emission Vehicles
- Cleaning up electricity for London's transport
- Transforming London's bus fleet
- Delivering zero emissions taxi and private hire fleets

- Transforming London's public and commercial fleets
- Developing Low Emission Neighbourhoods

5.8 Go Ultra Low City Schemes

In January 2016, the OLEV 'Go Ultra Low City' funding was awarded to four cities; Nottingham, Milton Keynes, Bristol and London. Each city created a bid which outlined innovative plans to drive the uptake of EVs.

London: London received 13 million to be spent over four years in four different areas.

- Residential charging infrastructure and a delivery partnership which can implement it.
- Install electric vehicle chargers at 1000 car club bays.
- Increase the number of rapid chargers to 300 including rapid charging hubs
- 8 neighbourhood of the future schemes which encourage the uptake of EVs within the boroughs

Tower Hamlets are part of the consortium of London Boroughs which can apply for funds through the GULCS framework mechanism for residential on-street charging networks, electrification of car club bays and the roll out of rapid charging infrastructure. The GULCS will be a key funding source for LBTH to utilise for the delivery of a range of EVCP infrastructure. Following a GULCS bidding process in early 2017, TfL have confirmed LBTH have been awarded £36k GULCS funding in 2017/18 to fund 75% of the costs for installing residential on-street charging facilities. The remaining 25% funding is intended to be provided by LBTH LIP mechanism.

The funding criteria states that the funding can be used up to a maximum of £7.5k for each free standing charging point and £3k for each lamp column charging point.

LBTH will have the opportunities to source more GULCS funding in the next round of bidding, for 2018/19 delivery.

5.9 ULEV Delivery Plan

The Ultra Low Emission Vehicle Delivery Plan (2015) details how London will achieve widespread EV uptake. It defines 15 actions which will be carried out in order to



achieve the transition from internal combustion engines to ULEVs. The ultimate aim is for the entirety of the London vehicle fleet to be ULEVs by 2050.

The four areas of focus are: vehicles, infrastructure, innovation and marketing. Whilst the infrastructure area is most pertinent to this strategy, councils should equally consider the entire plan as an example of best practice in all EV policy.

5.9.1 Infrastructure:

- Create a rapid charging network by 2018
TfL are creating a network of rapid chargers in the capital to support zero emissions capable (ZEC) taxis and commercial fleet vehicles. They will install 150 chargers by 2018 which will coincide with the requirement for new taxis to be ULEVs and in advance of the introduction of the ULEZ in 2020.
- Provide residential charging options
It is acknowledged that residential charging will become a significant challenge in the future as the rate of EV adoption rises. It is also a major barrier to more drivers converting from ICE to ULEVs. London is committed to providing support and funding to councils who introduce residential charging schemes. However, it does not explicitly describe any particular methods of solving this problem.
- Support Source London
London will continue to support the Source London network of chargers which is operating and expanding across the capital. Equally, it is not discouraging other networks from developing alongside.
- Identify charging locations
TfL are currently researching the best sites for EVCPs and plan to publish a Charging Infrastructure Location Guidance document. Until then, the 'Guidance for Implementation for Electric Vehicle Charging Infrastructure' remains their most up to date publication.

5.9.2 Vehicles:

- Car Clubs: By 2025 50% of the Car Club fleet will be ULEVs. Car clubs have great potential to introduce drivers to EVs and encourage them to convert from ICEs
- Convert the 1100 strong GLA and TfL fleet to ULEVs
- Taxis and PHVs: ZEC requirement from 2018, achieving fully ZEC fleet by 2033
- Increase the number of ULEVs in freight and fleet. Preparing the freight industry for the introduction of the ULEZ
- Buses: In preparation for the introduction of the ULEZ in 2020 all single decker

buses in central London will be ULEVs by 2020 and the entire TfL fleet will be converted by 2040.

5.9.3 Innovation:

- Demonstrate and test new technologies
- Test geofencing for ULEVs
- Prepare London for hydrogen vehicles

5.9.4 Marketing and Incentives:

- Increase public awareness of ULEVs
- Offer incentives for ULEV uptake
- Support local air quality schemes
- Streamline ULEV and charging infrastructure procurement

5.10 TfL Electric Vehicle Charging Infrastructure Location Guidance for London, July 2017

This much anticipated document has recently been published and provides an evidence based guidance to help boroughs and operators identify where best to locate charging infrastructure to meet the current and future needs of EV users across London. The document brings together the findings from independent technical studies commissioned by TfL, with input from stakeholders.

The content of the guidance is focused on 4 themes which have emerged from the research commission by TfL regarding current and future use of EVs in London. These themes are:

- Identification of current demand
- Provision for future uptake
- Installing appropriate charge points in the right locations to ensure the type of charging point installed reflects the needs of the user
- A good geographical spread of charging networks

The guidance focuses on the specific needs of London's key EV user groups:

- Residents and visitors without off-street parking
- Services and deliveries
- Local businesses
- Car Clubs EV fleets

With the provision of three categories of publicly accessible charging infrastructure.

- On-street residential charging for residents without off-street parking facilities
- Rapid chargers
- Destination / top-up charging offered by commercial networks

The content of this guidance has been used to inform sections of this document include future EV ownership and EVCP demand and the types of EVCP required.

6.0 EVCP OPTIONS APPRAISAL

6.1 The Charging Mix

The location and manner in which EVs need to charge is not uniform. It is therefore important to consider the whole charging mix when planning EV charging infrastructure. This will ensure that a network is established which will meet the various needs of users. The majority of charging currently occurs at home or work in a private off-street parking location. Where local government can contribute most is in the spheres of on-street residential charging, rapid charging for taxis and LGVs and trip destination charging, both on-street and in publically accessible car parks.

6.2 Residential charging

"Within 10 years it is envisaged that perhaps one in five on-street overnight parking bays will need a charging socket" – Milton Keynes Council

Currently, the majority of EV owners charge their vehicles off-street, at home or work. However, approximately 85% of residents in LBTH do not have access to off-street parking. In order to support the uptake of electric vehicles amongst these residents, it is important that on-street chargers are installed. An additional challenge is accommodating the demand for accessible EVCPs from the high concentrations of taxi and PHV drivers who live in the borough, who will need to ensure their vehicles are compliant with TfL's zero emission capable licensing requirements by 2020.

Councils will play a key role in providing this infrastructure, as residential charging provision has, so far, not been considered commercially viable by private commercial charging point operators. As an emerging demand, there is little precedent on how best to provide these chargers, especially in areas of high on-street parking stress. Below are some potential solutions.

6.2.1 Fast chargers

Fast chargers can be employed in residential locations in much the same way as other locations; either floor standing or mounted onto a wall, for specific car park locations. A single unit will generally offer two sockets which allow vehicles in two adjacent bays to charge simultaneously. The key challenges are funding, loss of parking and how to reserve bays just for residents.

Private commercial charging point operators are unlikely to provide extensive

coverage of network charging infrastructure in residential areas due to lower profit returns, so alternative funding models are required. Westminster has trialled a residential solution where chargers are installed within CPZs. Three users commit to a yearly fee which covers the cost of installation. They then share the usage of the bay, parking in normal residents bays for the remainder of the time. This may prove controversial in areas of high parking stress and lower income neighbourhoods.

6.2.2 Socket networks

Socket networks are plug sockets discretely installed in the footway. There are several variants including bollards (such as those installed on Roman Road Market), popup posts and flip top boxes.

They would offer slower 3kW speeds (like a standard 3-pin plug) but this would be sufficient for overnight trickle charging.

These ideas have not been widely trialled but they are seen as being a low cost solution to residential charging, once clusters of EVs begin to form.

Consideration would have to be given on how best to manage access to these units. One solution is to use 'smart cables'. The user would purchase a cable and the metering technology within it would allow the DNO to bill the user for the energy consumed. A simpler solution would be to provide keys, in a similar way to CPZ permits.

There is potential for creating trip hazards and this would have to be considered. However these units are widely used for other purposes already and are not thought to pose significant risk.



6.2.3 Street lamp chargers

Lamp post charging is a different approach to residential charging, which taps into the existing power network for street lighting. As they piggyback on an existing power grid, they are limited in the power they can supply but are sufficient for overnight charging. They are currently seen by many as the preferred option for residential charging. LB



Hounslow has conducted a successful trial of the Ubitricity technology and several other small trials are currently underway.

The key limitations are a requirement for front of footway lampposts, sufficient capacity within the local lighting grid and in the case of internal units, a compatible diameter and door.

There are several manufacturers entering the market. The two most advanced are Ubitricity and Eluminocity; each of which employs a different approach.

Ubitricity have a unique approach to lamp column charging. They use a 'Simple Socket' installed within an existing lamp post paired with a separate 'smart cable' which contains the communication and metering technology. This approach keeps the chargers small enough to be retrofitted internally and passes some of the cost on to the consumer via purchase of the cable.

The 'Smart Cable' possesses mobile metering technology and data communication capacity. All consumptions are measured precisely and are billed directly to the consumers account. The cost of each Smart Cable is approximately £600.

The 'Simple sockets' infrastructure is low-tech and low cost. It does not possess data communication capacity or metering technology. It stays inert until it is 'woken up' by the SmartCable where, following authorization, charging can begin. Figure 19 below, shows images of the smart cable and the simple socket lamp column charging infrastructure.

Figure 19. The smart cable and simple socket lamp column charging point.



Figure 20.

Ubitricity are conducting trials with London Boroughs including Hounslow, Richmond and Hammersmith & Fulham.



The cost is significantly less than a floor mounted fast charger and maintenance is minimal. This allows multiple chargers to be installed in one location. Due to their simplicity, they can be easily moved if demand changes.

Eluminocity's approach to lamp post charging is more similar to a traditional floor mounted, stand alone charger. The charger still uses the power supply from the lamp column, but the unit is attached to the outside of the post in a 'backpack' style.



The benefit of this approach over the Ubitricity model is that all the communications technology can be integrated into the unit, rather than an external smart cable, allowing anyone to use them.

The product is visible and obvious to members of the public which is in keeping with TfL guidance; visibility will help to drive adoption.

6.3 Rapid charging

Rapid chargers are capable of recharging a vehicle in 20 minutes rather than hours. They are vital to long distance travel and for commercial vehicles such as taxis, which will need to top up during the day.



The standard rapid charging speed is currently 50kW although we are beginning to see much faster chargers with speeds of up to 400kW. In the coming years it is expected that these faster speeds will become widely available.

Rapid units are significantly more expensive than fast chargers, costing in the region of £40,000. For this reason they are rarely funded directly by councils. Instead private operators rent land from the council and operate the chargers commercially, in return for a profit share.

Due to their greater power consumption, they require larger feeder pillars or a substation and often more extensive civils works. It can be more difficult to find locations for rapids which have a suitable power supply and sufficient space for the feeder pillar

It is becoming increasingly common for rapid chargers to accept debit card payments, which is much more convenient for the user than a subscription service.

6.3.1 TfL Rapid Framework

TfL have publicised their rapid charging framework, offering the scheme to local authorities within London. They are proposing to identify locations across TfL, borough-owned and private land which would be capable of hosting EV rapid charging infrastructure.

Under the scheme, chosen locations would be tendered out to six charge point operators who will bid for a concession contract to install, operate and maintain rapid charge points at their own cost. TfL will fund the installation of the power infrastructure and street furniture.

6.3.2 Other Providers

There are several other operators who will fund and manage rapid chargers. Source London / Bolloré is most notable in London, others include Engenie and InstaVolt.

6.4 Destination charging

There are many network operators who provide trip destination chargers. Each network operates a different business model but they can be separated into those who lease the land from councils and those who sell chargers to councils and profit from fees charged to the user. Within London the two largest networks are POLAR and Source London.

6.4.1 Source London

Source London is operated by Bolloré Ltd., on behalf of TfL. The network currently consists of over 1000 EVCPs but there are ambitious plans to greatly expand this number, with over 2000 by 2019. Users are required to pay a monthly subscription and can then operate the EVCPs via an RFID card.

Signing up to the Source London variation agreement would be a quick win for LBTH. At no cost, a network of chargers could be installed and the council would receive an annual income which could be reinvested into other EV schemes.

However due to the commercial concerns of Bolloré, Source London chargers may not be able to operate in all the locations that LBTH wishes.

The solution to this potential issue is to operate a parallel network within the borough. The following is an example of a charge point manufacturer and operator which would be a suitable alternative.

6.4.2 POLAR

The POLAR network is the UK's largest charging network (outside London) with over 12000 points. It is owned by EVCP manufacturer Chargemaster. The company operates points across the country and holds contracts with numerous councils including Milton Keynes and the City of London.

Users operate the chargers using either an app or RFID card. There is the option to either pay for a monthly subscription or to pay on an ad hoc 'pay as you go' basis. This provides flexibility to occasional users

who can arrive at a charger, download the app and charge with no prior planning whilst offering convenience to regular users who simply tap their card on the reader. The pricing aims to be cheaper than charging at home: 9p/kWh for members.



7.0 EVCP SITE SELECTION PROCESS

The following section outlines the criteria which should be considered when identifying suitable locations for the installation of EVCPs. The key principles include identifying locations which:

- minimise the impact on existing parking pressures in the immediate area
- will generate a sufficient level of usage demand to ensure the EVCP will become self financing, ie economically viable
- are logistically practical for installation, in terms of footway space, kerb positioning and accessing electricity supply

Sites must meet a number of criteria. The priority of each criterion is ranked below in Figure 21, which includes essential requirements. These criteria rankings should be used as a flexible guide, as each site location differs with specific benefits and challenges, making some sites more suitable for specific types of ECVP infrastructure. The criteria prioritising approach will be regularly reviewed to take into account feedback from users and consultations as EVCP infrastructure is introduced across the borough.

Figure 21. Criteria used to assess suitability of a site for EVCP installations

Criteria	Priority	Explanation
Sufficient demand	Highest priority	Demand must be high to ensure utilisation and enable EVCPs running costs to become financially self sufficient. New EVCP's need to be located at localities where there is existing demand from EV owners and potential demand from future EV owners. Initially, new sites will be geographical spread out to ensure there is local demand.
Minimal impact on parking stress	Highest priority	Impact on existing parking provision should be minimised in areas of high on street parking stress to avoid conflict between EV users and other car drivers. However, it is equally important to ensure sufficient EVCP provision is provided to encourage non EV car owners to make the

		switch, in the knowledge they will be able to charge their EV close to home.
Position of existing chargers	Medium priority	Ideally chargers will be installed to create an even geographical spread across the borough. Initially, new EVCP's will not be located too close to existing publically accessible charging points, unless there is evidence of high demand and requests from residents/businesses for additional EVCP infrastructure in the same locality.
Accessibility for the user	Medium priority	Ideally chargers should be within close proximity to the residence or destination of the users
Potential for multiple bays	Lowest priority	Where possible sites will have potential to support multiple bays, either active or passive. This will ensure EV owners can be confident they will EVCP availability, as charging demand increases.
Available power supply	Essential requirement	There must be sufficient power infrastructure available to supply the EVCP
Feasible Design	Essential requirement	The location must be able to support the charger and street furniture, in terms of adequate footway space for pedestrians behind the charging unit, close proximity to the kerb edge, to minimise trip hazard risk from trailing charging lead, and access feed to electricity supply.

7.1 Sufficient demand

Residential Areas: With 85% of Tower Hamlets residents without access to off-street parking provision, locating networks of accessible EVCPs in residential areas, within walking distance of resident's homes is a key consideration.

Concentrations of EV permits: Controlled Parking Zone permits are heavily discounted for EVs. Analysis of the currently issued permits shows two concentrations

of EVs: around Arbour Square and near Shadwell Station.

Trip destinations: EVCPs are required at trip destinations such as retail, leisure, and commercial premises where visitors are likely to park. PCL used OSM land use data and local knowledge to identify these areas.

Taxis: The upcoming legislative requirement for the electrification of taxis and PHVs will drive demand for rapid charging within the borough and access to residential charging infrastructure for overnight use. EVCPs should be located in areas frequented by taxis, including taxi ranks, railway stations and taxi repair garages. TfL research identifies Tower Hamlets is home to a large number of taxi and PHV drivers. Further data regarding this predicted demand is contained within the Recommendations section of this report.

Arterial routes into London: Rapid chargers should be located on main roads leading into London. This makes it convenient for taxis, freight and long distance travellers to top-up during their journey.

TfL's EV uptake projections: TfL commissioned studies to predict EV ownership growth and future on street EVCP demand are based on the estimated number of EVs parked on street. This data forms a key part of the selection criteria and is referred to in more detail in the recommendations section.

Proposed new developments: New developments should be considered as they are likely to increase demand for charging. New residents who require access to a vehicle, but do not have off-street parking access, should be facilitated to use an EV, through the provision of local charging provision.

Low Emission Network: The tri-borough low emission network scheme is trialling innovative air quality initiatives through installation of filtered accessibility priority for EVs and the provision of on-street charging provision in the Hackney part of the LEN. Providing EVCPs close by within Tower Hamlets would support the take up of EVs and associated benefits of air quality improvements in this area.

Car Parks: Car parks provide convenient and suitable locations for destination/top-up charging and should be prioritised as good locations to support visitor EV demand, as these are locations where vehicles are left for some time. Car parks are easier for installing ECVPs as there is less conflict in regard to loss of parking spaces from other road users and the presence of EVCPs raises awareness of the facilities for future EV adopters.

Housing Land: Tower Hamlets homes own large areas of land within the borough and have several thousand parking bays which could be repurposed as EV charging points. Further consultation and discussions are required before an agreement can be reached for the utilisation of these estate parking spaces for EVCP installation.

7.2 Minimal impact on parking stress

Much of LBTH already experiences high on-street parking stress and the introduction of EVCP bays needs to be carefully located to minimising the loss of parking provision for non EVs in areas of high on-street parking stress. Ideally areas of high parking stress should be avoided so as not to exacerbate parking problems. Where this is not an option there should be a high level of confidence that the EV bay will be well utilised. Parking restrictions and enforcement should be carefully controlled so that these bays are not abused.

The issue of existing parking stress is also a factor in determining whether a cluster of EVCPs could be installed within one street or in close proximity within a neighbourhood, and whether these should be allocated a designed EV only parking space or left unrestricted. For LBTH, where there is high parking stress borough wide, the recommendation is to install dedicated and enforceable EVCP parking bays, to ensure EV users gain access to the points when they need them.

7.3 Position of existing chargers

LBTH should aspire to achieve a good geographical spread of EVCPs across the borough. TfL research showed that 93% of drivers would use a charger within 5 minutes walk of their location, decreasing to 73% for a 10 minute walk. Areas already served by existing chargers, which are publically accessible, were given lower priority, although the majority of the existing network in Tower Hamlets has limited public access, located in car parks with access restrictions.

7.4 Accessibility for the user

In order for an EVCP to be well utilised it must be located where it can be easily and conveniently accessed by the user. Different types of users will need to be accommodated in different locations. For example taxis and LGVs who wish to charge during the working day require rapid chargers, located on key arterial routes into London and close to taxi ranks. Whereas, a local resident who wishes to charge

their vehicle regularly will require a standard or fast charger, within easy walking distance of their home. Access to residential on-street charging facilities will also be used by taxi and PHV drivers living in Tower Hamlets for overnight charging.

Physical restrictions such as car park closing hours should also be considered.

7.5 Potential for multiple bays

Where possible it is best practice to install multiple bays in one location, especially in locations of high demand to ensure EVCP accessibility for users. It is recommended that in locations where it is feasible to install multiple EVCP's, although current charging demand does not require multiple points, it is preferable to install passive provision, by providing the necessary civil infrastructure required, then additional EVCPs can be added at a later date, quickly with minimal installation works, when charging demand has increased.

7.6 Available power supply

To determine whether a location would be viable as an EVCP location it is important to investigate how the electricity supply will be installed; both the physical infrastructure and the availability of electricity.

The DNO (Distribution Network operator) must be contacted and permission obtained to connect to the grid. They will indicate the power capacity available. Due to the large amounts of power which chargers draw they may mandate that upgrades are made to the infrastructure. This is of particular concern with rapid chargers. Upgrades to cables and transformers can become prohibitively expensive.

Ducts and cables must be laid and a feeder post installed. The feeder post will include the energy metre. With some 'fast' chargers it is possible to integrate the post into the charge point or a wide based sign post to minimise street clutter.

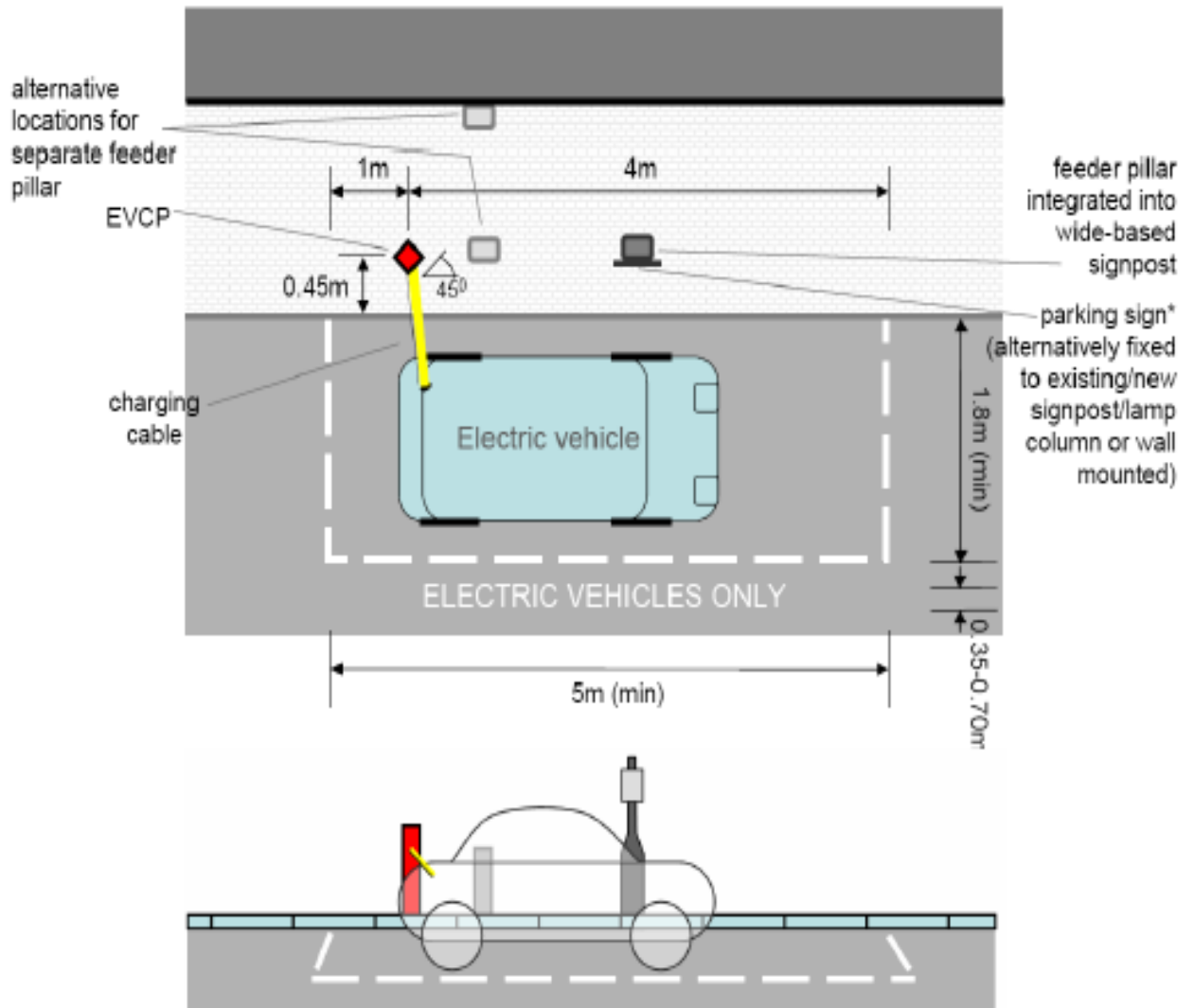
7.7 Feasible Design

An EVCP must be accompanied by a selection of street furniture; this includes a bay marking, sign post/plate, a feeder pillar and often a barrier in front of the unit. Consideration should be given to whether these items can be installed in an acceptable manner. Consider street design guidance, visual impact (especially in

conservation areas) and safety. TfL have produced design guidance for EVCP bays in different scenarios, as shown in Figure 22 and Figure 23.

- TfL streetscape guidance recommends that the charge point should be 450mm from the kerb edge and should leave a minimum of 1500mm footway clearance for pedestrians
- If a location fails to meet this criterion, an option could be to provide a build-out within a bay to facilitate the charging point, thereby removing the need to place the unit on the footway. There is however greater impact on loss of on street parking space
- A single 50kW rapid charging unit would require a Type 1 feeder pillar (380mm x 800mm x 1125mm - D x W x H). If two or more rapid charge points are being considered, a Type 2 feeder pillar is required (500mm x 1250mm x 2250mm). Fast chargers require smaller pillars which are less restrictive
- The length of trailing charging cables should be kept to a minimum to prevent trip hazards. The angle of cable between the charger and the car is key to achieving this

Figure 22– TfL EVCP Design Guidance Illustrated



* See TSRGD 1028.4 for indicative layout/dimensions of bay - formal recognition of road markings/sign subject to *Traffic Signs (Amendment) Regulations and General Directions (TSRGD) 2010* consultation document – September 2009

Figure 23: Good Practice principles for the design of on street EVCP bay layouts

Good practice principles for designing the layout of on-street charging bays:

- **Angle of EVCP and height of controls:** position the charging point at 45 degrees to maximise accessibility (for disabled as well as non-disabled users). As with parking meters, the controls should be at a height which permits access by wheelchair users
- **Street clutter – feeder pillar:** to minimise street clutter incorporate feeder pillar into modified (wide-based) signpost housing (or where possible use charging point with integrated feeder pillar)
- **Effective footway width – feeder pillar:** where separate feeder pillar is used locate so as to not obstruct access to charging point or pedestrian movement on footway – consider locating at back of footway
- **Sign plate location:** where possible, locate sign plate on existing signpost/lamp column or on wall (assuming integrated signpost/feeder pillar not used)
- **Kerbside obstructions – charging cable:** locate feeder pillar no more than 0.45 metres from kerbline to minimise extension of charging cable
- **Contact details – feeder pillar:** feeder pillar to show borough and EV supplier contact details
- **Sign plate details and road markings –** currently require type approval from DfT but formal recognition proposed in DfT consultation document. Road markings likely to be a variant of TSRGD no. 1028.4

7.8 Charger Installation Check List

The site selection principles outlined in Figure 21, earlier in this chapter, form the basis of the site selection audit, detailed below in Figure 24, which should be carried out to confirm the suitability of potential EVCP locations.



Figure 24: Site selection audit

Purpose	Users	Who will use the chargers?	The location and type of charger should be matched to the needs of the expected users.
	Chargers	What type of charger do you intend to install?	
Scale of plans	No. of EVCP bays	How many ECVP bays do you plan to install?	It is best practice to install multiple bays/chargers at each location. This increases the likelihood of there being an available charger for users and introduces economies of scale for the council.
	Passive provision	Will you install passive provision?	Passive provision of infrastructure allows additional chargers to be easily installed as demand increases in the future.
Location	Demand	Are you confident that there will be a high demand for a charger at this location?	Chargers should only be installed where they are likely to be regularly used. Consultation with residents/business is important.
	Accessibility	Is this location accessible easily and at all times?	To ensure a high level of usage a charge point should be accessible at all times.
	Existing provision	How many chargers are there in the surrounding area?	The ideal situation is a wide geographic spread of chargers across the borough. Users are unlikely to walk more than 10mins from the charger to their destination.
Energy Supply	DNO permission	Do you have DNO permission to install infrastructure at this point?	Chargers cannot be installed unless permission is obtained from the DNO.
	Network Capacity	Is there suitable power capacity to supply the charger/s planned. The speed or number of chargers may have to be adjusted.	The DNO will define the amount of capacity available in the local network.
	Upgrade works	If no, what upgrades will need to be made to the infrastructure?	Upgrading the power infrastructure such as cables and transformers may be prohibitively disruptive or costly.
Impact on parking	Loss of parking	Will there be a loss of existing parking spaces?	Locations should be chosen which minimise the impact on parking stress.
	Dedicated bays	Will dedicated bays be installed?	In most situations a dedicated EV charging bay is required to prevent 'ICEing'.
	Restrictions	If yes, what parking restrictions will apply to these bays?	Limited stay parking restrictions can be applied.
	Enforcement	Have you considered how the bays will be enforced?	Enforcement of EV restrictions is required. CEOs may require guidance on how to achieve this. Smart sensors may aid this process.
Design	Street furniture	What street furniture is required?	Most EVCPs require bay markings, signs, feeder pillars and barriers.
	Feeder pillar	What size of feeder pillar will be required?	Rapid chargers require large feeder pillars which may be prohibitive, especially when more than one unit is installed.

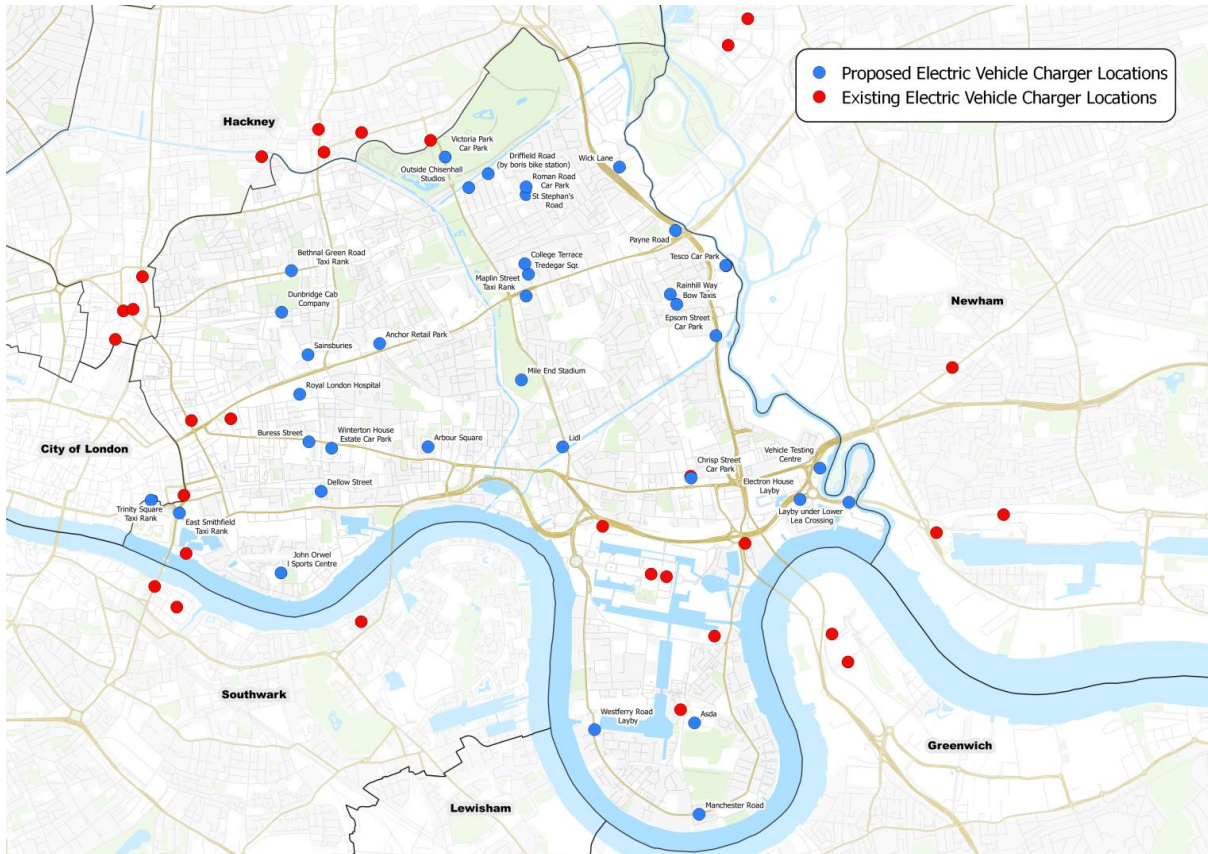
	Footway width	Is there sufficient footway width to accommodate the charger and other street furniture?	TfL recommends 1500mm of footway and 45mm of clearance between the kerb edge and charger.
	Build outs	If there is not sufficient width then will a kerb build out be required?	Kerb build outs are a possible solution to limited footway width but they will have a greater impact on parking stress.
	Trip hazards	Does the design minimise the risk of trip hazards?	EVCPs should be designed as to limit the length of trailing cables.
Maintenance		Is a maintenance plan in place for the chargers?	There will be ongoing maintenance issues which must be resolved and paid for.
Cost efficient installation	Street works	Is it possible to install the EVCPs as part of other street works schemes?	Where possible reduce the number of individual street works that must be carried out. This reduces costs and disruption.
	Passive provision	Is passive provision being installed	
	Multiple points	Are multiple EVCPs being installed at this location	
Review	Strategy	Have you considered this location in the context of the wider strategy?	An individual charger will form part of a wider network, which must be considered.
	Review	When will this charge point be reviewed?	Existing chargers should be regularly reviewed. Lessons learned must inform the selection criteria used for future charger installations.

7.9 Potential EVCP Sites

PCL has conducted an initial desktop exercise to identify 35 locations, which appear to be suitable for EVCPs. These sites will require further investigations including site visits, parking stress analysis/surveys, Distribution Network Operators (DNO) permission, local grid capacity and utilities searches before they can be confirmed as viable.

The selection attempts to achieve a good geographical spread and provide sites suitable for different types of users and charger types. Figure 25 maps the location of the proposed EVCP locations, and includes the locations of existing charging points both in Tower Hamlets and within close proximity in neighbouring boroughs. Details of the exact location details identified for the 35 potential sites for EVCP installations are contained in **Appendix A**.

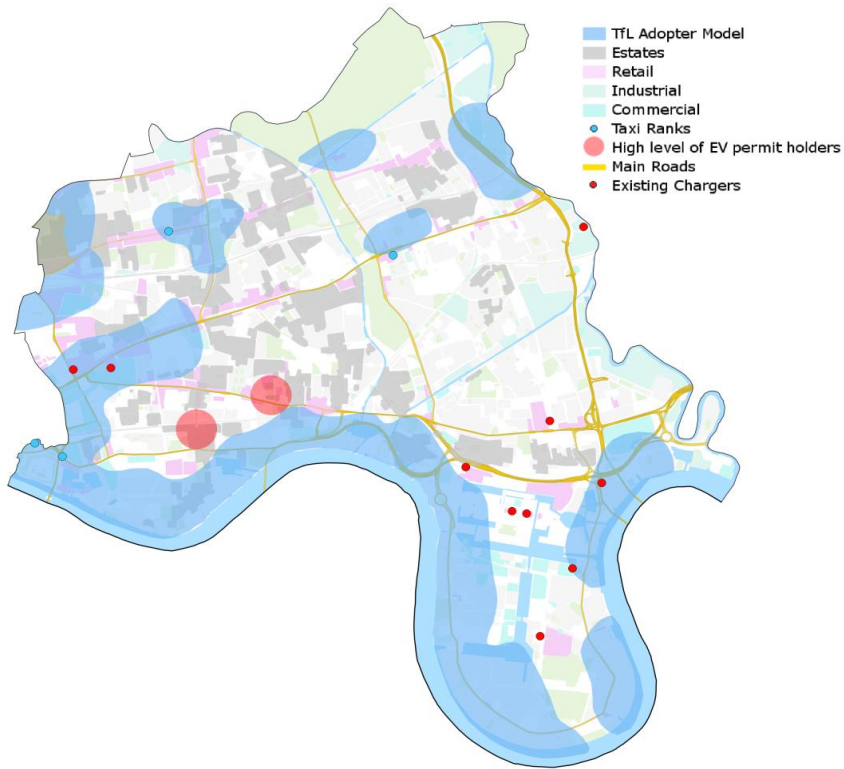
Figure 25. Proposed EVCP locations and location of existing charging points.



These sites were identified as quick wins in regard to being the easiest to implement for the initial round of EVCPs expansion. Car parks, key routes into central London and areas frequented by taxis were a priority for identifying these 30 locations. Residential on-street locations will be the focus for the next phase of site selections surveys, delivered through GULCS funding with LIP match funding.

Figure 26, below displays the over laying of data relating to a number of the criteria used to identify suitable areas with high demand or potential demand for EVCP access.

Figure 26. Criteria used to identify suitable areas for EVCPS.



8.0 FUNDING OPTIONS AND PROCUREMENT

Whilst it is vital that LBTH is able to provide EV charging infrastructure it is also important that these schemes remain as cost neutral as possible. Therefore LBTH must make best use of all available funding streams. These include TfL LIP and GULCS funding, national grants, commercial networks, local budgets and development levies.

- TfL/ LIP /GULCS Funding

GULCS funding (detailed in section 5.8), the Borough's annual LIP funding allocations, and new funding streams allocated through the MTS3 and LIP3 process, such as the Healthy Streets and Liveable Neighbourhoods initiatives will provide the majority of the funding support directly obtained by LBTH to invest in the take up of EVs and the expansion of charging infrastructure.

- Partnerships with Commercial EVCP network operators.

There are two main Commercial EVCP network operators in London, the largest by far is the Source London network from BluePoint Ltd, and there is the Polar network from Chargemaster. These commercial operators will fully fund purchase, installation and maintenance for the charging infrastructure installed and their back office administration service. In return the operator will require approval from the Local Authority to lease a site (usually an on street space or car park space to install the EVCP) and the right to charge users for the service. This will enable the LBTH to provide accessible EVCPs to the public with no capital cost involved. The Source London network is the primary option in London and it is strongly recommended that LBTH sign up to the Source London partnership as a matter of urgency.

- Source London Network

BluePoint Ltd (BPL) took over the management of the Source London EVCP network from TfL in September 2014. There are now over 850 Source London EVCPs across London, providing access to both fast and Rapid charging facilities. Charging points can be booked in advance via an app or the Source website which indicates available EVCPs nearby or on your route. Membership of Source London is required to access these charging points which is currently £48 per year (£4 a month) and gives the EV owner access to the entire Source London EVCP network. There are additional costs each time for charging at a

Source London EVCP. These are 3.6p/min when using their new smart charge points with a minimum session fee of 20 minutes and an overnight cap of £8.64 from 8pm to 7am. For the Rapid Charger, the costs are £1.80 fee plus £0.30 per kWh.

The benefits to the Council for introducing the Source Network into Tower Hamlets are:

- There are no costs incurred by the Council for the EVCP purchase, installation, maintenance, repairs, upgrades and electricity use of the Source Network. BPL will do everything.
- Majority of EVCPs installed will be Fast chargers. Rapid charger installations may also be possible if suitable locations can be found.
- BPL will commit to funding the expansion of the Source London charging network in Tower Hamlets (covering all costs inc TMO's, consultation and installation) with plans to install over 2000 charging points across the London network by 2018.
- New charge point installations will only be made with the full agreement of the Council.
- LBTH will receive a fixed income of £700 per charging point per year.
- 20% of cumulated net profit will be proportionally shared with partners once BPL is profitable and pro-rata the number of points in boroughs.
- LBTH will have access to an online statistics & reporting tool which will provide usage data and will enable tracking and monitoring of all charge points.
- BPL will hold a contractual yearly meeting with Boroughs to discuss the pricing policy.
- BPL will apply a discount to car club fleets according to the number of hours they spend on a Source London bay. The discounts applies to the standard £2/ hour rate.
- BPL will consider introducing flexible charging tariffs with reduced hourly charging rates at off peak times and in areas of the borough which are more residential than town centre.
- BPL may request to trial their electric car club fleet, which is currently being successfully rolled out in Hammersmith and Fulham.

Other Commercial EV charging options:

In addition to the Source London network, the Council is considering alternative and compatible charging infrastructure solutions to meet the increasing demand for on-street access to charging infrastructure. These options include Charge Master's Polar Network and alternative on-street charging provision such as setting up local residential networks and socket charging (via plugging into existing street furniture such as lamp columns).

The Source London network alone can not address rising demands for on-street charging access from Tower Hamlets residential neighbourhoods, especially as BluePoint's ambitious expansion plans for the Source London network will predominately focus on providing charging facilities at hub/attractor locations, including town centres, retail centres and transport interchanges. However, BPL will be committed to rapid expansion in the borough, at no cost to the Council, which would provide a speedy option for installing a network of EVCPs across the borough within the next 12 to 18 months. Source London has confirmed they could install up to 200 EVCPs in Tower Hamlets in the space of the next 24 months.

- Government Grants

The Government offers a number of grants for ULEV projects, administered via OLEV. The primary fund available to local councils is the residential charging grant which provides 75% of the capital costs for on-street residential charging. Additional grants include:

- The Electric Vehicle Homecharge Scheme
- The Workplace Charging Scheme
- The On-street Residential Charging Scheme
- Plug-in Car Grant
- Plug-in Van Grant

- Planning regulations

The London Plan requires 20% active and 20% passive provision of EV chargers for all new developments.

- Section 106

Require developers to contribute to on street chargers in the areas surrounding their developments.

- Community Infrastructure Levies

Requirement to contribute to a charging infrastructure strategic fund could be set up to provide for charging infrastructure and projects in the wider community, paid for by contributions from developers.

8.1 Procurement

The newly proposed TFL procurement frameworks are an exciting development. Firstly it will greatly simplify the procurement process. Secondly it will develop a specification which is established as suitable for all councils.

The rapid charging bid framework is an innovative approach to EV charging that looks to combine the benefits of public control and planning with the financial backing and expertise of private CPOs.

8.2 OLEV

The Office for Low Emission Vehicles (OLEV) is part of the Department for Transport and the Department for Business, Energy & Industrial Strategy. OLEV is a team working across government to support the early market for ultra-low emission vehicles (ULEV). They are providing over £600 million from 2015 to 2020 in funding to position the UK at the global forefront of ULEV development, manufacture and use. An additional £270m was announced at the 2016 Autumn Statement. This will contribute to economic growth and will help reduce greenhouse gas emissions and air pollution on UK roads.

In 2017, London Councils, TfL, and the GLA were awarded £5.2 million for a residential scheme and £2.93 million for a car club scheme by OLEV. London Boroughs have submitted their initial bids and registered their interest, in order to win a percentage of the funds.

- Infrastructure Grants

The Government (as of January 2017) has committed almost £1bn to support Ultra Low Emission Vehicles (ULEVs) from 2015-2020. Of this funding, £32m has been committed for infrastructure. This has been broken down into the following schemes:

- The Electric Vehicle Homecharge Scheme

OLEV is currently part-funding electric vehicle charging points for domestic installation. To help private plug-in vehicle owners offset some of the upfront cost of the purchase and installation of a dedicated domestic recharging unit, the Government is running the Electric Vehicle Homecharge Scheme. Customers who are the registered keeper, lessee or have primary use of an eligible EV may receive up to 75% (capped at £500, inc. VAT) off the total capital costs of the charge point and associated installation costs. Customers must provide evidence of keepership, lease, be named as the primary user of an eligible EV or have a vehicle on order in

order to be able to qualify for the grant.

- The Workplace Charging Scheme

The Workplace Charging Scheme is a voucher-based scheme that provides support towards the up-front costs of the purchase and installation of EVCPs for employee and fleet use. The contribution is limited to £300 for each socket up to a maximum of 20 across all sites for each application. The voucher will be valid for 4 months (120 days) from the date of issue, (expiry date printed on the voucher). Once the charge point(s) have been installed, the authorised installer will claim the grant from OLEV on the applicant’s behalf by submitting a PDF claim form via OLEV’s portal.

- The On-street Residential Charging Scheme

This grant is available to councils who wish to install on-street charge points in residential areas. This encourages the installation of chargers in these un-commercially viable areas which are not attractive to private companies.

OLEV will fund 75% of all capital costs up to £7500. This includes the equipment, installation and costs associated with the bay and TMO.

- Plug-in Car Grant

OLEV will offer a grant to subsidise new ULEVs. The funding depends upon which category the vehicle falls into, as shown in Figure 27, below. This scheme will be open until March 2018.

Figure 27. Categories of OLEV grant funding.

	Requirement	Grant	Examples
Category 1	Cars with a zero emission range of over 70 miles	£4,500	Full EVs such as BMW i3 and Nissan LEAF
Category 2	Cars that have CO ₂ emissions of less than 50g/km and a zero emission range of between 10 and 69 miles	£2,500 (If vehicle under £60k)	Hybrids such as the Audi A3 e-tron and Toyota Prius Plug-in)
Category 3	Cars with CO ₂ emissions of 50 to 75g/km and a zero emission range of at least 20 miles	£2,500 (If vehicle under £60k)	

- Plug-in Van Grant

A more generous grant is available for commercial vehicles. There are currently very few ULEV vans and the higher subsidy represents the desire to drive adoption in this category. For vans under 3.5T there is a grant of 20% of the price (up to £8000) and for those over 3.5T there is a 20% grant capped at £20000. This will be reviewed either after 5000 applications or in 2018 depending on which is reached first.

OLEV also fund other projects such as the Go Ultra Low Scheme which awarded £40million to four cities to carry out innovative projects which aid the adoption of ULEVs. It also funded the Plugged-in Places project which created regional charging networks such as Source London.

- Go Ultra Low Cities Scheme

The Go Ultra Low Cities scheme is part of a wider £600 million investment from the Government to encourage EV uptake in the UK through a step change in ULEV car uptake in their locality, including criteria for the bids included improvements in air quality, innovation, and linking with other OLEV schemes. More detail has been provided in section 5.8 of this document.

8.4 European Union Funding

Opportunities for funding innovative EV charging technologies, electrification of freight deliveries and behaviour change initiatives to encourage the take up of EVs are all measures which have recently awarded Horizon 20:20 funding through the European Union. Colleagues at the London European Partnership for Transport (LEPT), within London Councils provided regular EU funding briefing for London Boroughs informing of calls for funding submissions and partnership opportunities.

8.5 UK Government Budget

The most recent national budget pledged a significant level of funding to support the introduction and development of ULEV vehicles in the UK.

£80 million for charging infrastructure

£270 million as part of the industrial strategy fund

£150 million for the conversion to clean buses and taxis

£60 million to subsidise new electric vehicle

£4 million to fund the Go Ultra Low projects

- Clean Bus Technology Fund 2015

It is possible to bid for funding to upgrade buses to ULEVs and provide accompanying infrastructure via the Department for Transport's 'Clean Bus Technology Fund 2015'. Grants are available up to £500,000.

9.0 RECOMMENDATIONS

Provision of the appropriate charging infrastructures required to facilitate a substantial increase in EV usage in LBTH, requires a number of challenges to be resolved. This section provides a summary of the recommendations required to address these challenges and is followed by a detailed Action Plan of deliverable measures.

The challenges to EV uptake in LBTH have been identified as follows:

- Increasing number of requests for EVCPs from residents and businesses wanting to invest in EVs but do not have access to suitable charging points.
- Over three quarters (85%) of LBTH residents have no access to off street parking.
- Current inadequate provision of accessible and reliable charging points a barrier to further EV uptake.
- Majority of the borough experiences high on street parking stress and competing road user demands for limited kerbside space.
- Difficulties providing EV charging spaces in areas of high parking stress.
- Growing population and employment opportunities adding to kerbside pressures.
- Air quality and emission reduction targets will not be met without significant shift to EV usage and low emission modes of transport.
- Limited funding available for infrastructure installation. Long term maintenance and electricity usage charges need to be cost neutral to LBTH.
- 21000 estate homes with no charging provision and limited off street parking provision.
- Limited off-street parking. Only one council owned off street car park
- High demand expected for accessible fast chargers once ULEV/taxi electrification comes in. Key routes into the city will require rapid chargers as uptake increases (A11, A12, A13).

These challenges can be addressed through the provision of a range of EV charging infrastructure networks, located in appropriate and accessible locations to serve both existing demands as well as facilitating predicted growth in EV usage and ownership.

9.1 Vision for LBTH

LBTH needs to work towards making the following vision a reality by 2025.

'Tower Hamlets provides a network of easily accessible EVCPs which cater for a range of residential and commercial charging requirements from a growing number of EV users. This infrastructure has facilitated the growth in EV usage required for the borough, and London, to meet air quality objectives and deliver a zero carbon transport network by 2050.'

Over the next few years, increasing EVCP provision should ensure residents and businesses have increasing confidence in utilising and purchasing EV's as their preferred and most convenient choice of vehicle use in LBTH. Through the delivery of the recommendations and actions contained within this strategy, supported by accompanying actions within LBTH's Air Quality Action Plan and appropriate Local Plan and LIP3 policies, the above vision and EV user experience is realistic and needs to be attained if air quality improvements and emission reduction targets are to be met.

9.2 Objectives:

LBTH's primary objective should be to increase the proportion of EV's registered in the borough. Currently 0.25% (132) vehicles registered in LBTH are EVs. LBTH should aim to raise this number of EVs to 2% by 2020 (1056 EVs) and at least 10% (5280 EVs) by 2025.

This is in line with targets set out in the MTS3, to achieve a zero emission transport network by 2050.

To achieve these ambitious targets, LBTH requires the installation of a planned and coordinated network of EV charging infrastructure that serves the needs of all types of EV users, including residents, visitors and commercial fleets.

9.3 Principles for supporting EV take up

TfL's EV Charging Infrastructure Location Guidance (2017) recommends the following 4 themes are addressed to ensure the most appropriate type and scale of charging infrastructure is provided for current and future EV users.

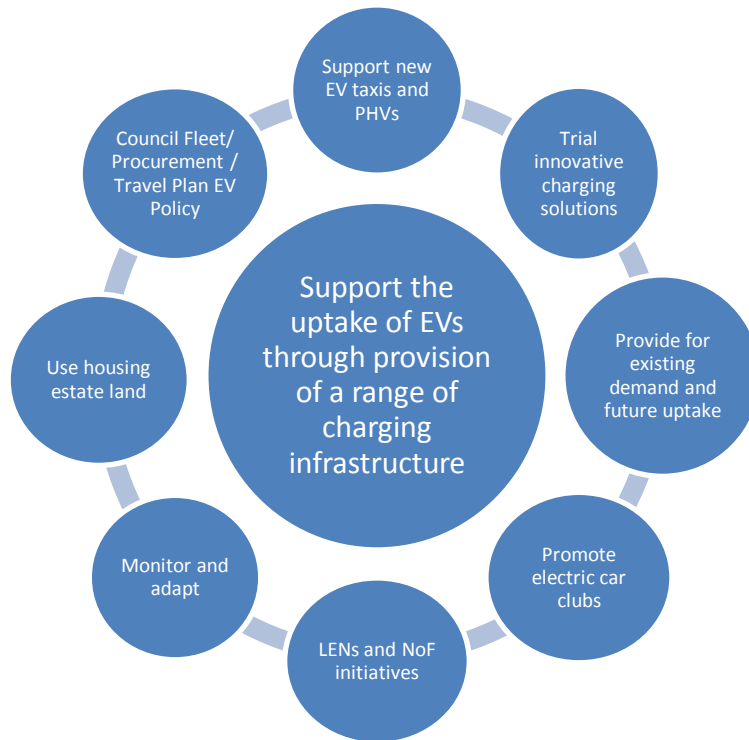


- Identification of current demand. Meet the existing demand from residents and businesses requesting access to charging points. Need to provide balance between competing demands for space and maximise charge point usage to ensure its viability.
- Provision for future uptake. Provided infrastructure based on predicted demand from residents and also prioritising requirements to charge essential commercial vehicles, zero emission capable (zec) taxis and PHVs.
- The appropriate charge points in the right locations to ensure the type of charging point installed reflects the needs of the user. Eg. Taxis and commercial deliveries will require quick and frequency top up charges from rapid chargers, located along strategic routes into central London.
- Provision of an accessible borough-wide EVCP network to encourage the switch to EVs. On street and public assessable car park locations in key trip attractor destination, with charging facilities open to all EV users by allowing pay as you charge option.

These principles apply to LBTH, and have been incorporated into the following recommendations and the action plan in section 9.0.

LBTH will need to deliver the following key actions, as illustrated by Figure 28 to implement the charging network required to facilitating EV expansion and demand.

Figure 28 – Objectives required to deliver the charging network to support the take up of EVs in LBTH.



9.4 Provide for existing demand and future uptake:

The key EV users in LBTH requiring access to charging infrastructure are broadly identified as:

- **Residents, predominately without off-street parking**

Approximately 85% of LBTH residents do not have access to off-street parking provision such as driveways or car parks so to make the switch to EV usage they are reliant on access to on-street parking provision.

Future on-street EV charging requirements for inner London residents have been predicted as part of TfL’s research for the EV Charging Infrastructure location guidance. The study used the key characteristics of existing EV owners across London, which correlated to households in employment with higher incomes. Applying these characteristics to projected population and car sales in 2025 provides a prediction of EV ownership levels in 2025. Figure 29 shows the results of this predicted EV ownership in London, which suggests wards within Tower Hamlets will have EV ownership levels of between 4 to 10+ % of the total vehicle stock. (Figure 30 provides zoomed in close up of Tower Hamlets) This is a rapid rise from the current 0.25% EV ownership rate in Tower Hamlets in just 8 years.

Figure 29 shows potential EV ownership levels in London in 2025.

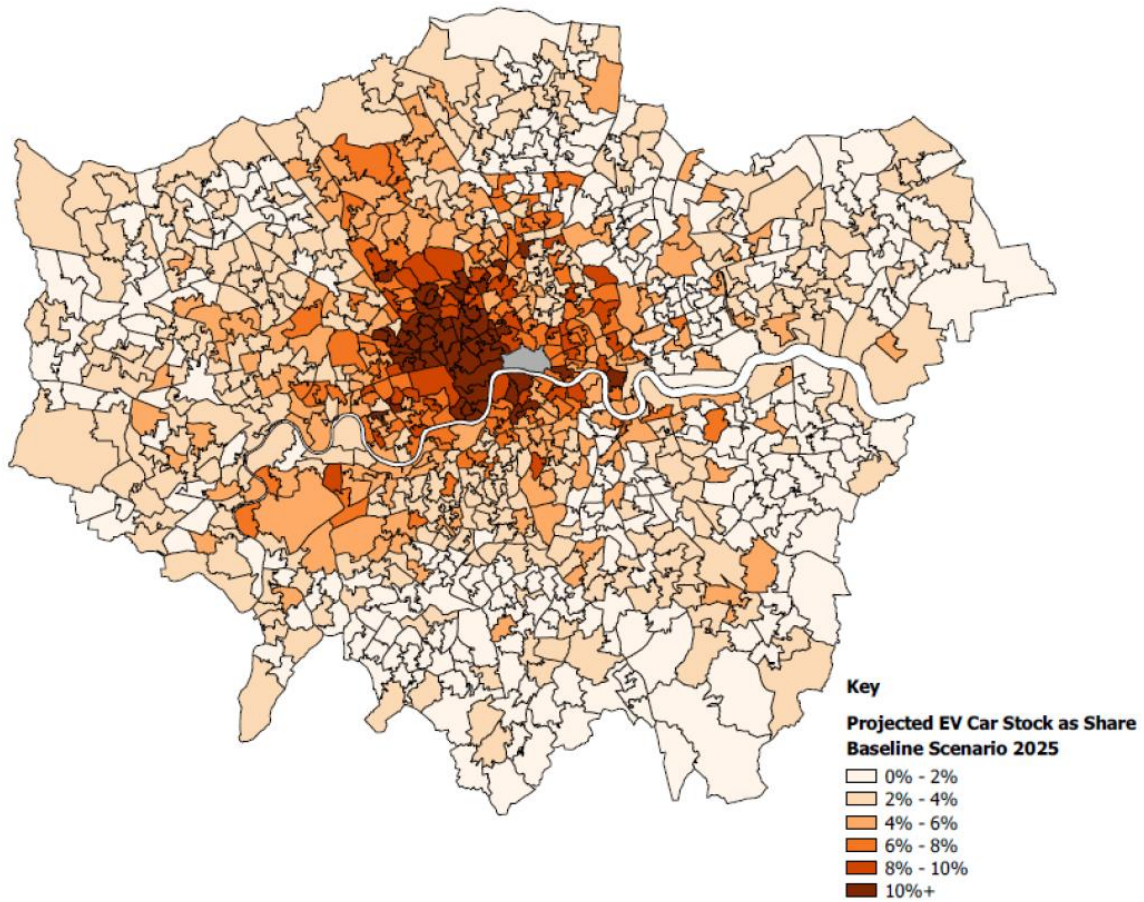
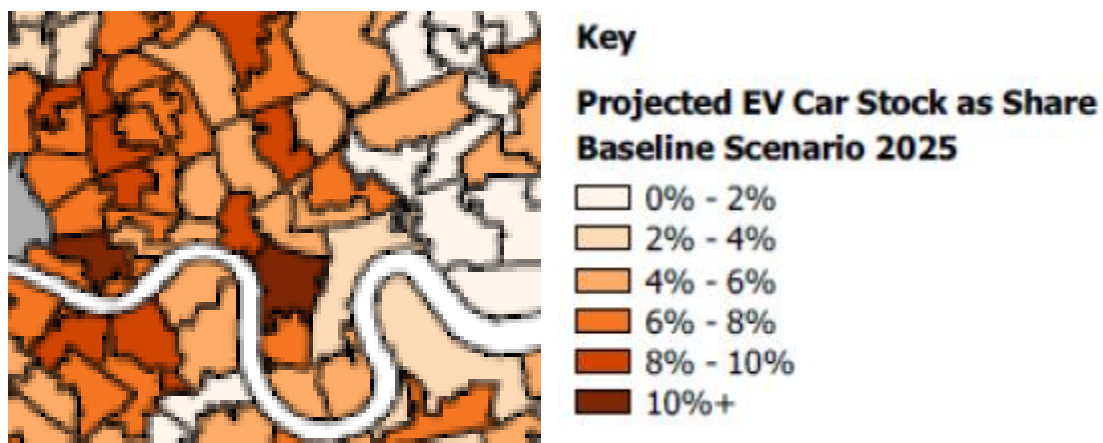


Figure 30. Zoomed into Tower Hamlets wards, showing range of EV ownership predicted to be between 4 and 10+%. (Source TfL, 2016).



With approximately 85% of LBTH residents currently without access to off-street parking facilities, the rapid increase in EV ownership by 2025 will require an extensive network of on-street charging facilities.

Figure 31 below, shows predicted numbers of EV's parked on-street by 2025, based on the ownership figures in Figure 30, above. This was calculated by combining EV

uptake projections with assumptions on reliance of on-street parking (ie the 85% of residents without off-street parking).

Figure 31 shows potential number of resident owned EV's parked on street across London in 2025, which will require to charge on street. (Source: TfL, 2016).

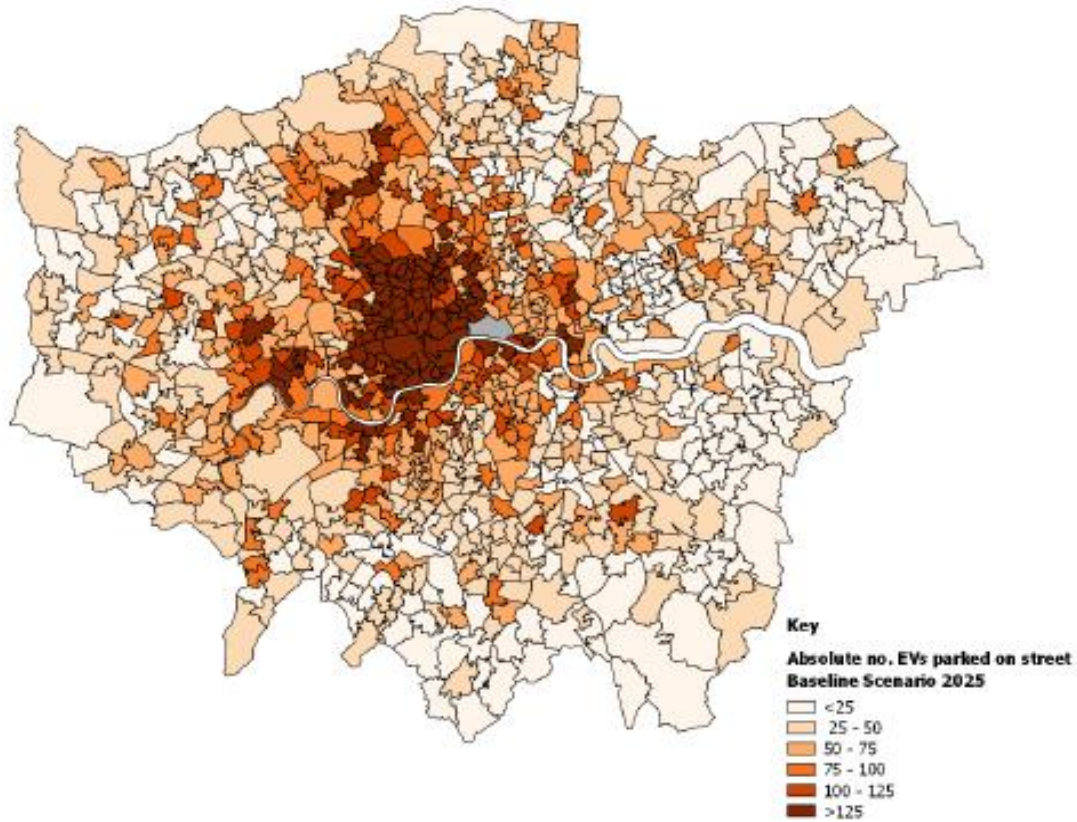


Figure 32. Zoomed into Tower Hamlets wards, showing number of EV's parked on street requiring access to charging facilities could range from 25, to more than 125 depending on the ward. (Source TfL, 2016).

Figure 32. Zoomed in version of Figure 31.

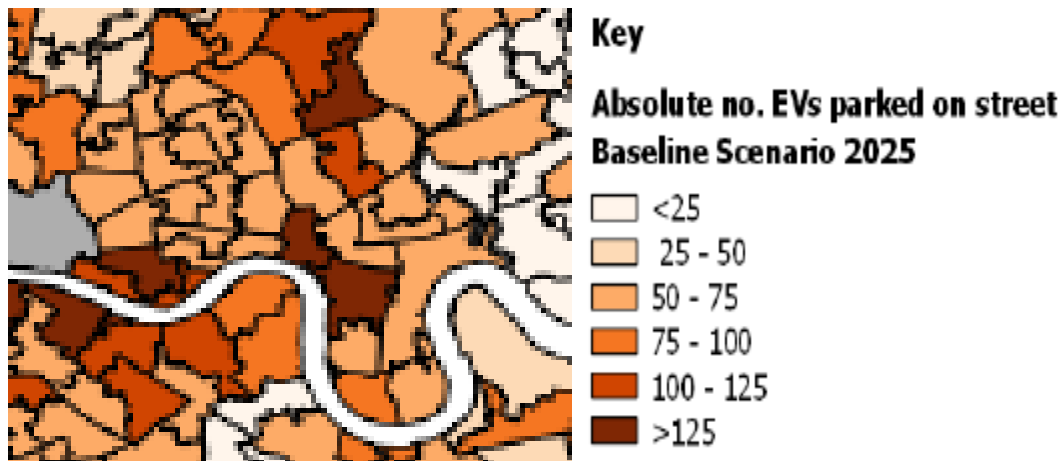


Figure 32, suggests there could be pockets of high demand for on-street charging provision in some residential streets in Tower Hamlets. Many of these locations already experience high levels of parking stress, and in areas like Canary Wharf there is limited on supply of on-street parking spaces.

The lack of additional parking and rising population densities may result in on-street charging demand being high in more wards than this projection suggests.

This will required an extensive network of local residential on-street charging hubs, which initially will need to be funded via the GULCS, the Borough's LIP and S.106 developer contributions.

LBTH will need to consider provision for additional EVCP capacity for future demand when planning to install on-street charging facilities, such as providing passive provision for the installation of additional charging points, as EV uptake and demand increase.

LBTH will also have to balance EVCP access with other conflicting demands for limited street space. Certain sections of street will need to be prioritised as EV charging hubs, resulting in the conversion of parking bays for EV charging. Although this, initially, could create conflict with non EV car owners, prospective EV owners need to have confidence they will be able to charge their vehicle on-street near their home, in order to make the choice to purchase an EV.

Provision of shared on-street charging facilities for residents, local businesses and visitors would help balance competing demands for parking.

The option of allowing residents to charge their EV's on-street by trailing a cable across the pavement from their property will also be considered. Guidelines will be

drafted to identify the criteria, terms and conditions. This will include charging mats of appropriate and charging lead specifications, and associated safety mechanisms to mitigate against the risks of trip hazards, electric shock and tampering plus the liability responsible and associated insurance cover.

To reduce the trip hazard risk, the protective matting would need to be secure to the floor, no taller than 20mm and should have tapered edges down to about 5mm, which is achievable to carry standard charging cables. 10 Amp EV cables are 2mm in diameter, 32 Amp EV cables are 5mm in diameter, so both should fit within 20mm tall matting.

There would also need to be an electric current instant cut off mechanism built into the lead and socket to reduce risk of electric shocks if the charging lead, socket or vehicle are tampered with or vandalised. This safety mechanism would need to be similar to those incorporated into existing public EVCPs including the lamp column socket charging facilities.

- **Car club operators**

Car club services provide an alternative to private car and require an accessible range of fast charging infrastructure to enable operators to introduce more ULEV vehicles into their fleets, to ensure at least 50% of car operators fleets in London are ULEV's by 2025.

Expansion of EV car clubs will be an essential service to encourage lower car dependency in Tower Hamlets, as population densities and demand for EVCPs increase from car owners.

Electrification of existing and all new car club bays can initially be funded through the GULCS funding and then longer term, operators should be required to invest in the infrastructure in designated bays for back to base services. Floating and point to point car club models will require access to rapid, destination fast chargers and on street residential charging networks.

- **Taxis and PHVs**

TfL has confirmed that 'zero emission capable' (ZEC) licensing requirements for taxis and private hire vehicles (PHVs) are coming into force from 1st January 2018 and from 1st January 2020 for newly licensed PHVs. In addition to these licensing requirements a number of PHV firms are already deploying or are interested in introducing ULEV's into their fleets.



The nature of taxi and PHV's journey requirements means electric taxis and PHV's will require access to charging facilities at home as well as fast and rapid charging facilities in strategic network locations (to minimise down time)during their hours of operation.

Figures 33 and 34 demonstrate that many taxi and especially PHV drivers are residents in Tower Hamlets who will not have access to off-street parking. These drivers will need access to on-street charging points close to their homes, if they are to convert to ZEC vehicles.

Figure 33. PHV driver home post codes showing high numbers are residents within Tower Hamlets, as shown by the shades of blue.

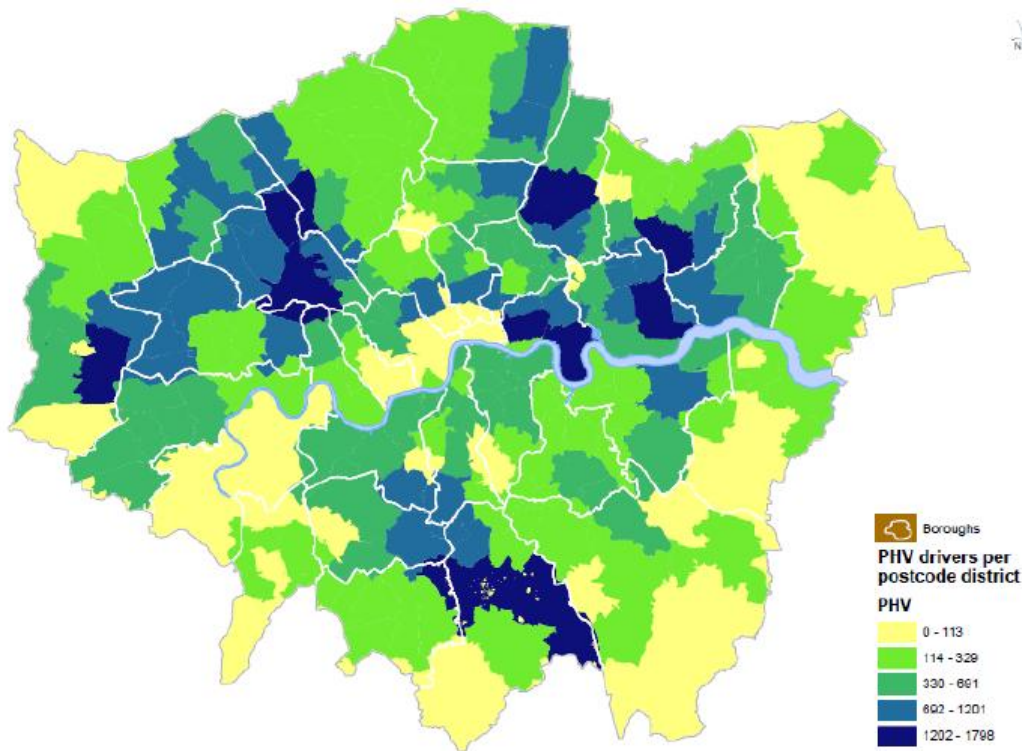
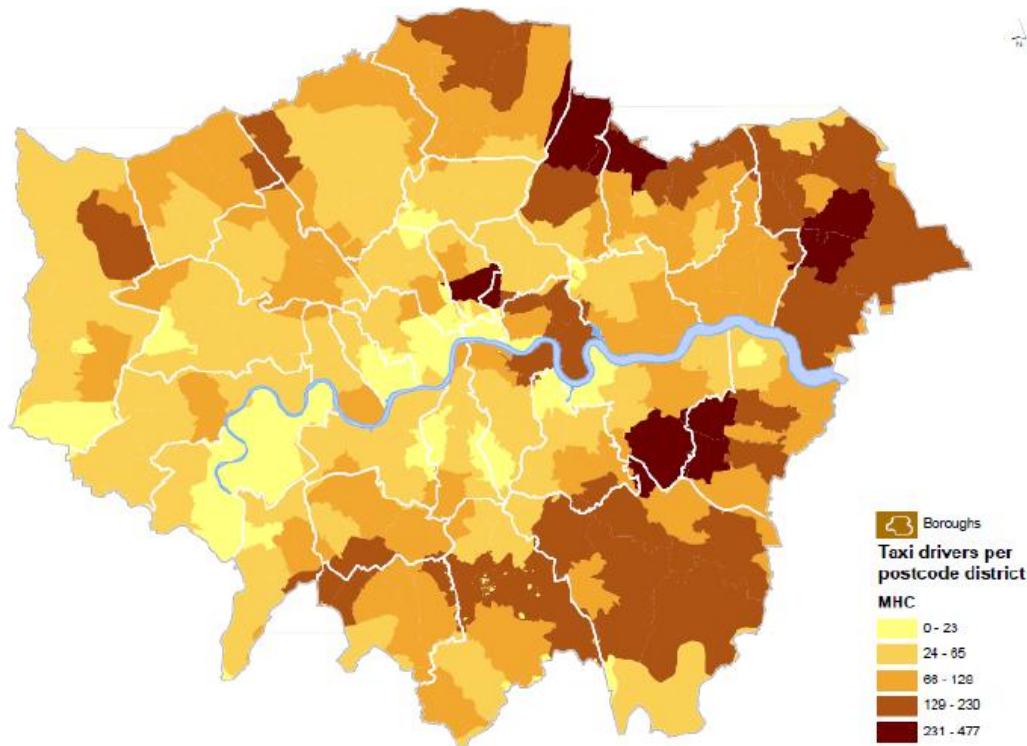


Figure 34 Taxi driver home postcodes shows there are high numbers of taxi drivers living in Tower Hamlets.



The data above highlights the need to provide local access to rapid and fast EVCPs in the short term, with a mass rollout of residential focused EVCPs in the short to medium term.

Immediate rollout of EVCP infrastructure is required to support the predicted increase in EVs parked on-street, supplying both residential and commercial demands (initially taxi, PHVs) through a range of charging facilities, including on-street residential, visitor, car club and business use, rapids for taxis, PHV's and public access and off-street (car parks and private).

- **Commercial fleet operators (deliveries and servicing)**

LGV and HGV freight traffic consisting of commercial fleet operators and local business deliveries and serving vehicles account for a substantial percentage of traffic within central and inner London, including Tower Hamlets. Within the City Fringe LEN area in Hackney, HGVs, LGVs and buses, account for 78% of all traffic.

The majority of these LGV's and HGV's are diesel contributing directly to local air pollution hotspots.

Reducing transport emissions from these vehicles is essential and the provision of fast charging on street infrastructure will be necessary to encourage fleet operators and local business to switch to ULEVs.

Areas of Tower Hamlets, such as Brick Lane, the LENs area and Canary Wharf have a



mix of residential and commercial activity competing to kerbside space. Provision of commercial charging networks such as Source London or Polar can provide access to encourage EV take up in the short term. In the medium term shared on street charging infrastructure for use by residents, business and visitors would help balance competing demands.

9.5 Identifying the appropriate EVCP locations

TfL’s EV charging infrastructure guidance recognises the street type classification guidance used by TfL to classify all London streets according to the function of movement and place can be used to assist with identifying the most appropriate locations for installing different types of EVCP infrastructure.

As detailed in Figure 35 below.

Figure 35. EVCP mix for Street type classification

Type of charging infrastructure	Street type classification
Residential on street charging	Local Streets – make up 80% of London’s road network, predominately borough managed roads where majority of boroughs residents live.
Rapid charging	Streets with high movement or high ‘place’ function and along strategic corridors. Often Rapids with located in off street ‘hubs’ close to these types of streets, close to town centres and transport hubs or in designated LENS areas such as the City Fringe LENS.
Destination / top up charging	High Streets and city streets, in town centres and retail/supermarket/leisure facility car parks that attract car trips.

The range of EV charging facilities appropriate to LBTH are:

- **On-street residential charging for residents without off-street parking facilities.**

Provision of on-street residential charging facilities, usually for regular overnight charging, can be provided by standard 3kw or 7kw standard charging points, which provide a full charge within 6-8 hours. Use of street lamp columns as charging points can also be considered to increase coverage for residential street locations, where the lamp column positioning is close to the kerb to minimise trip hazard potential.

The key EV users requiring access to on-street residential charging points are:

- Residents and visitors without off-street parking
- Services and deliveries
- Local businesses
- Car Clubs EV fleets

- **Rapid chargers**

Rapid charging points (up to 50kw) provide a full charge in approximate 20-30 mins. These chargers are suitable for high mileage users such as ZEC taxis, PHV's and electric commercial fleets involved in deliveries and servicing which require quick and frequent charges. Rapids are also useful for ULEZ car club fleets and as a top-up for residents. To support the introduction of EV taxis, LBTH should install rapid chargers via the TfL framework. LBTH should aim to install 10 rapid chargers by 2020 and 20 by 2025/26, subject to available funding, identification of suitable locations and power supply capacity.

- **Destination / top up charging**

These are usually fast charging units (22kw) providing a full charge within approximately 2 hours. They are offered by commercial operators such as the Source London and Polar networks. To ensure viability, fast chargers are usually located in trip generator destinations including High Street shopping centres, town centres, and retail/supermarket car parks, where there will be a high turnover of customers. Faster charging units are useful for car club vehicles, delivery and servicing vehicles and as back up options for residential charging.

9.6 EVCP Installation targets

Taking into account the above summaries of potential EVCP demand, LBTH will need to be ambitious with its targets for implementing publically accessible charging infrastructure. The Action Plan table details the recommended EVCP installation requirements and delivery schedule. In summary this involves the implementation of:

- **Commercial Networks** of faster chargers provided by Source London and accompanying alternative network such as Polar. Approximately **200** fast chargers could be installed through this network by 2025/26.
- **On-street residential networks**. A minimum of 150 EVCPs will be required by 2025/26, with interim milestones of 50 installed by 2020 and **150** available by 2025/26. Ideally a network closer to 300 should be installed by 2025/26, requiring 100 EVCPs available by 2020 and a further 200 installed by 2025/16. **300** on-street EVCPs would provide a borough wide coverage of 2 EVCPs within 10 minutes (or within 500 metres) or every residents home.
- **Rapid chargers**. Install 10 GULCS funded EVCP's before 2020. LBTH should aim for the installation of 4 rapid charges by 2018/19 and **10** in total installed by 2020. LBTH should then aspire to increase the number of rapid charges to at least **20** by 2025/26, subject to funding and power supply capacity.

It should be noted that it is currently difficult to estimate how many EVs would be serviced by a single on-street EVCP. Currently there are very few clusters of EV vehicles which rely solely on public chargers. Due to this lack of information we are unable to confidently predict how many vehicles an EVCP could support. Our best estimate would be 10-15 (one Standard 7kW charger, with two bays) but there is significant uncertainty in this number.

9.7 Trial innovative charging solutions

To prepare the borough for a future with high demand for EV charging infrastructure in residential areas it is important to trial new technologies which could be rolled out in the future. A particular focus should be to undertake a feasibility study to identify suitable residential lamp column charging locations, incorporating the learning from the trials undertaken in Hounslow and Kensington.

Innovative shared on-street charging solutions such as charging from lamp columns could ensure the provision of a high density of accessibility on-street charging facilities to meet predicted on street demand by 2025.

9.8 Electrification of LBTH's fleet of Council and contract vehicles

LBTH currently runs a fleet of vehicles. These vehicles could be converted to EVs. We recommend that LBTH replaces its vehicles with EVs as their replaced or leasing contracts are renewed.

9.9 Make use of underutilised housing estate land for new charger sites

Tower Hamlets Homes owns large amounts of land within the borough, including 788 parking spaces which are currently unrented. These underutilised bays could be redesigned as public electric vehicle charge points. Alternatively bays could be electrified to encourage EV ownership amongst residents of THH's 21000 residential properties.

Provide for existing demand and ensure viability of charging point.

The provision of electric vehicle infrastructure should remain cost neutral wherever possible so as not become a financial burden on the council.

To achieve this LBTH should make use of all available funding and revenue. This includes government grants, partnerships with private companies which provide profit shares and fees, make use of planning powers (sect. 106 and CIL).

9.10 LENS and NoF initiatives

There are a number of innovative proposals and incentives being developed within the LEN's and NoFs schemes prioritising access for ULEVs, focuses on freight, deliveries and servicing vehicles, in areas of poor air quality. LBTH should consider rolling out these LEN's proposals in appropriate locations across the borough, providing fast and rapid charging infrastructure to encourage the take up of ULEV delivery fleets.

9.11 To monitor and adapt to developments in the field of EV

EV is a fast moving new technology. To ensure LBTH is providing the best possible infrastructure it must continue to periodically monitor developments and update strategy accordingly. A review of EVCP strategy should be carried out no later than 2020.

9.12 Lobbying and working in partnership

The recommendations and actions contained with this strategy supports the delivery of several actions identified within LBTH's Air Quality Management Plan, relating to Council vehicle fleets, green procurement, lobbying TfL and LIP3 policies for delivery of Healthy Streets and Liveable Neighbourhood schemes. All the 'Cleaner transport'

actions are supported as well as identifying lobbying and partnership opportunities.



10. Action Plan for the delivery of LBTH EV Charging strategy

The following action plan contains several proposals to support the take up of EV's and provide the range of charging infrastructure, supporting policies and incentives to encourage EV take up and meet future charging demand. The measures are SMART, with a timescale and funding options provided.

Objective	Action / Tasks	Outcomes	Details	Time Scale: Short term: <2yrs Medium: 2-5 yrs Long term: 5+ yrs	Funding Source
Support the uptake of EVs through provision of a range of charging infrastructure Page 413	<ul style="list-style-type: none"> Respond to current demand. Undertake survey of charging habitats of EV users in Tower Hamlets. Provide for future uptake Install appropriate infrastructure in right locations Provide EVCP network to cover whole of LBTH 	Increase proportion of EV's in LBTH from 0.25% to 2% by 2020 and above 10% by 2025. Install up to 300 EVCP's by 2025/26. (Minimum target is 150 EVCPs). Supported by network of 100 EVCP's by 2020/21 and 300 EVCPs by 2025/26 to ensure all resident and business EV owners in LBTH are within 500 metres of an accessible charging point by 2025.	The overall ambition of the EV strategy should be to increase the proportion of vehicles which are EV. Currently 0.25% (132) vehicles registered in LBTH are EVs. LBTH should aim to raise this number of EVs to 2% by 2020 (1056 EVs) and at least 10% (5280 EVs) by 2025. Immediate rollout of EVCP infrastructure is required to support this increase in EV's, supplying both residential and commercial demands, through a range of charging facilities, including on street residential, visitor, car club and business use, rapids for taxis, PHV's and public access and off street (car parks and private) providing a network of at least 150 EVCPs and an aspiration to stall 300 by 2025/26. TfL research informs that 93% of EV users would use a fast charge point within a 5 minute walk of their vehicle and 73% would use a charge point if it were within 10 minutes walk. This equates to a distance of roughly 500m. LBTH should aspire to install significant ECVP coverage to ensure all residents and businesses are within 500m walking distance to an accessible charging point. This would require an estimated minimum of 150 EVCP's installed at locations spread across the borough. However, EVCP's ideally should be located in clusters of at least 2 units per location, to increase availability. This will require the installation of 300 publically accessible EVCP's.	Short, Medium and Long Term	Various – see below
Install range of EVCPs across LBTH to provide for existing demand and support growth of EVs	Destination/top up charging infrastructure: <ul style="list-style-type: none"> Sign up to Source London to enable charging infrastructure to be quickly installed across the borough. Co-operate with BPL to find suitable locations Consider introducing alternative commercial charging networks (in addition to Source network). Arrange meeting with Chargemaster (provide Polar network) and Ubitricity (use smart 	Provides network of maintained fast charging infrastructure for destination/top up charging in high turnover locations, such as town centres/retail/supermarket or transport hubs. Membership and PAYG access. No investment required by LBTH and income source guaranteed. Source London installs chargers. Council will received an annual permit income from each Source London charging point. Alternative networks, such as the chargemaster Polar network could also be introduced to extend EVCP coverage	Source London is able to provide fully managed chargers at no cost to LBTH and will provide an annual income per charger. This is an efficient, cost positive way to provide chargers, however parallel networks are also required to meet the needs of all EV users. Source London are likely to aim for a rapid installation of fast chargers, located in clusters of up to 3 in high turnover destinations. It is realistic to assume up to 100 fast charger ECVPs could be installed by 2020. Source London representatives have confirmed they have the capacity and resources to deliver this infrastructure within a year and have the ambition to roll out over 200 EVCP's if they can agree suitable locations with LBTH . This figure could be higher if an additional commercial network is added, such as Polar.	Short and Medium Term	COST POSITIVE FOR LBTH Externally funded by Commercial Operators + generates modest income for LBTH

Page 414	leads and lamp column charging).	of LBTH residents and businesses.	Commercial network EVCP energy requirements will need to be linked in to LBTH's infrastructure delivery plan to ensure there is future grid capacity.		
	<p>On-Street residential charging Install GULC funded on street charging points for residential, car club use and local business use.</p>	<p>Locate in following areas:</p> <ul style="list-style-type: none"> • where already demand for charging points, • where likely to be future demand (ie residential areas without off street parking provision), • to provide access for local business use, • to electrify existing and future car club bays. • Minimise loss of existing on street parking provision. • Aim to install at least 2 charging spaces per location. • Require a minimum of 150 EVCP's installed for residential access by 2025/6. • Ambition is to install up to 300 EVCP's by 2025/26 	<p>PCL have identified 35 potential sites for rapid, destination, and residential on street EVCP installation based on a desk top analysis. A thorough borough wide, street by street audit is required to identify suitable sites for up to 300 EVCPs to be installed by 2025/26.</p> <p>This will enable EVCPs to be installed in pairs at 150 locations across the borough, providing residents with access to an EVCP within 10 minutes walk (under 500 metres) from their home.</p> <p>EVCP's installations will include standard chargers, including lamp column charging and faster charging installations in locations of high demand.</p> <p>The GULCS framework will advise of the types of residential charging networks and back office arrangement to implement.</p> <p>EVCP energy requirements will need to be linked in to LBTH's infrastructure delivery plan to ensure there is future grid capacity.</p>	Short, Medium and Long Term	<p>GULCS + LIP funding</p> <p>£36k confirmed from GULCS for 17/18 delivery of EVCP's + 25% LIP match funding = £48k budget for 2017/18.</p>
	<p>Rapid Charging Network Install rapid chargers procured via TfL framework</p>	<p>Aim to install 10 GULCS funded EVCP's before 2020. TfL framework contractors will install rapids (currently 4 preferred locations). 9 further locations under consideration. LBTH should aim for the installation of 4 rapid charges by 2018/19 and 10 in total installed by 2020.</p> <p>LBTH should aspire to increase the number of rapid charges to at least 20 by 2025/26, subject to funding and power supply capacity.</p>	<p>TfL is already investigating a small number of sites for rapid chargers in the borough. LBTH should continue to support this process by identifying further locations, such as air quality hotspots (ie LEN), and busy high streets (Brick Lane/Shoreditch). The provision of the rapid network is vital to support the conversion of taxis, and PHV's to EV's and provides commercial delivery and servicing fleets with confidence to convert to EVs. Also provides back up charging option for residential EV usage. LBTH should aim to maximum utilise of TfL's funded rapid programme and install 10 rapid charging points by 2020.</p> <p>The ambition should be to have installed a total of 20 rapid chargers by 2025/26.</p> <p>Need to link in power supply requirements with LBTH's infrastructure delivery plan.</p>	Short and Medium Term	<p>COST NEUTRAL FOR COUNCIL GULCS/TfL Funded</p>
<p>Introduce charging hubs, as part of the delivery of the Liveable/ Healthy Streets approach identified in the draft MTS3.</p>	<p>Creation of charging/sustainable transport hubs. Incorporating EV charging facilities (inc lamp columns), alongside electric bicycle docking stations/secure on street cycle parking provision (in residential areas (flats) with limited cycle storage facilities), and electrified car club bays.</p> <p>Provide EVCP hubs, where concentration of charging facilities in locations where low emission transport is prioritised, to address air quality issues.</p>	<p>Linked to similar LEN's initiatives being developed for the City Fringe low emissions neighbourhood (see below). Also supports the merging MTS3 policies, incorporating Health Streets and Liveable Streets schemes, and supports LBTH Air Quality Management Plan (AQMP) proposals. Locations should be identified to fit the objectives of the AQMPs, targeting areas with the poorest air quality, closure to schools, playgrounds and shopping areas. Brick Lane should be considered for such measures.</p>	Medium and Long Term	<p>LBTH LIP FUNDING Liveable Neighbourhoods and Healthy Street funded schemes through LIP3 funding mechanism</p>	

Page 415					m
	<p>Trial innovative charging solutions Carry out audit of street lighting and other suitable street furniture, such as lit signage and BT boxes to identify suitably located infrastructure and adequate power supplies.</p>	<p>Use of existing street furniture for charging source, such as street lighting columns.</p> <ul style="list-style-type: none"> Set up lamp columns charging trial for residential and business use in appropriate on street locations. Trial utilisation of existing electricity feeder pillar supply in market areas for EV charging on non market days. 	<p>Lack of on street residential charging facilities are a major barrier to EV adoption in inner London where 85% of homes have no off street parking (TfL). Lamp post charging is currently seen as the most viable and economic mode of residential charging. LBTH should run a large trial in residential streets similar to the smaller successful trials run by other London Boroughs, including Richmond, Westminster and Hounslow's Ubitricity model.</p> <p>There are 10 street markets in LBTH, with a range of operating days, some 6 days a week (Monday-Saturday) or 5 days (Monday –Saturday) early morning till evening, others are 3 times a week or just on Sundays, which could be more practical for EVCP trials.</p>	Short and Medium Term	GULCS + LIP Funding + External Investment
	<p>Investigate options for allowing charging cables across public footway to enable on street EV charging from home.</p>	<p>Draft criteria for establishing guidelines for use of charging mats over the public footway to enable charging cable to trail from property, across public footway to charge EV parked on street.</p> <p>Clearly need to emphasis health, safety and liability risks associated with this option.</p>	<p>Draft criteria and guidelines to allow residents, in appropriate locations, to trail charging cables from their property across the footway to charge an EV parked on street. Through use of a protective mat to cover the charging cable to reduce risk of trip hazards. There are several health, safety and liability risks to be considered and mitigated against with this option.</p> <p>However, it could be a low cost short term solution to enable residents, especially the taxi and PHV drivers living in the borough, to charge their EV's directly outside their property, if strict criteria guidelines and liability responsibilities were agreed and adhered to. Criteria would include buy a protective mat and charging lead of acceptable specifications.</p>	Short and Medium Term	LIP funding and externally funded by resident requesting to charge on street from home
Support the uptake of EV taxis, PHV's and freight (deliveries and servicing)	Through progressing the installation of rapid chargers via TfL framework and accessible fast charging on street EVCP networks	TfL installs rapids in key locations for taxis and freight	With the introduction of the ULEZ and the EV taxi requirements there will be high demand for rapid EV charging within the borough. This will be concentrated around taxi ranks, stations and key routes into London. Rapid chargers should be installed at key locations.	Short Term	GULCS + LIP Funding
Electrify the LBTH fleet	To replace the LBTH fleet vehicles with EVs wherever possible and to provide accompanying chargers to support them at depots.	All new LBTH vehicles to be EV	LBTH should act as an example to the public and convert its fleet vehicles from ICEs to EVs. A policy should be implemented that all new vehicles will be EV. Also install chargers to service them at depots. This should be supported by a LBTH Travel Plan policy and target and will support LBTH's Air Quality Management Plan.	Medium Term	LIP and LBTH Parking Revenue funding
Workplace Travel Plan Policy	Travel Plan policies to incentivise conversion of grey fleet to EVs	<p>LBTH should consider introducing work place travel plan policies requiring employers to convert their employees grey fleet to EVs</p> <p>LBTH to lead by example and ensure its own policies for employee essential and casual car user allowance for grey fleet</p>	<p>This should be supported by a LBTH Travel Plan policy and target and will support LBTH's Air Quality Management Plan actions regarding LBTH's fleet operations. Could also be introduced as a condition within construction management plans for new developments and delivery and servicing plans for freight operations.</p>	Medium Term	S106 and LIP funding

		use are incentivised for electric car use.			
Green Procurement	Use procurement mechanism to require contracts to use EV's for delivery of services.	Contractors required to introduce ULEVs for their supply chain and delivery of services	This should be supported by a LBTH Travel Plan policy and target and directly contributions to the delivery of LBTH's Air Quality Management Plan, related to green procurement for contracts, borough fleets, deliveries, serving and freight.	Medium Term	COST NEUTRAL
Electrify car club bays	Install EVCP's at existing and new car club bays to allow electric vehicles to operate	Ensure at least 50% of car club bays are electrified by 2025 (currently equates to 86 bays). LBTH should aim to encourage car club operators in borough to have 100% ULEV fleets by 2025.	TFL's Car Club Strategy target requires at least 50% of car club fleets to be ULEV vehicles by 2025. This will require car club fleets to have adequate provision to EVCP charging infrastructure, through the electrification of at least 50% of existing and new car club dedicated bays and operators fleets having access to other EVCP networks. There are currently 171 car club bays within LBTH which could be converted to EV. Car club fleet operators require assurances that adequate charging infrastructure is accessible to roll out EV's within their fleets. Car Club EV's play an important role in normalising EV by raising familiarity and providing drivers with an opportunity to try electric vehicles. Car Clubs also play an important role in reducing private car ownership and usage. Supports same action identified in LBTH's Air Quality Management Plan.	Short, Medium and Long term	GULCS and external funding (car club operators)
Page 41 Electrification of car club fleets	Include as requirements when current car club contracts are retendered	Include ULEV fleet requirement as condition of new car club contracts. Require car club operator's fleets in LBTH are at least 50% ULEV fleets. Ensure car club operators in LBTH introduce ULEV's into their fleets and removed all diesel and Incorporate requirements for Developers to source car club provider with ULEV fleet options for S106 conditions for the provision of car club services for new developments.	Support TFL's ULEV Delivery strategy target to ensure 50% of car club operator fleets in London are ULEV's by 2025.	Medium term	COST NEUTRAL TO LBTH
LENs and NoF initiatives: Priority road access to EV's through filtered permeability road closures	Feasibility study for piloting road closures with filtered permeability, allowing access for ULEV's. Allocating strategic located car parks for EV only access, with charging	Incentivise EV ownership by introducing filtered permeability, only providing accessing for EV's and not ICE vehicles. Roads and junctions identified as poor air quality hotspots should be considered. Priority locations would be where there are existing rat runs, congested junctions and locations by local school Develop LEN's proposals for implementation in LBTH, focussing on ULEV priority for access, loading and freight deliveries.	Filtered permeability, allowing access for ULEV's but not ICE vehicles can be enforced through the use of number plate recognition cameras. This is the approach being considered by Hackney Council as part of the City Fringe proposals within the Low Emission Zone neighbourhood, in which some streets could be prioritised for access pedestrians, cyclists and ULEV's, focusing on freight and deliver traffic. Similar proposals should be introduced in LBTH. PCL are already considering feasible sections of LBTH's road network where filter road closures could be trialled, such as part of road safety traffic management proposals around schools, bring the added benefit of alleviating traffic congestion, encouraging active travel and significantly improving air quality. Undertake feasibility of introducing these measures for ULEV only access in commercial streets with poor air quality. Egg, the Brick Lane area, at certain busy periods and for deliveries traffic. Restricted access to ULEV's during periods of the day, to improve local air quality and encourage operators to convert to ULEV for undertaking deliveries.	Medium and Long Term	LIP FUNDED Liveable Neighbourhoods and Healthy Street funded schemes through LIP3 funding mechanism

			These initiatives should be identified in conjunction with LBTH's Air Quality Management recommendations and is linked to the Liveable Streets and Healthy Streets policy approach identified in the draft MTS3.		
Incentivise EV via parking tariffs	Provide discounted P&D fees for EV drivers	Reduced parking fees, which will act as an incentive for EV adoption. Review Borough's parking charging policies and charging structure	LBTH already discounts parking permits heavily for EV vehicles. To further this policy LBTH should consider similar discounts at its P&D parking bays to encourage the use of EVs. LBTH should consider active travel related incentives to encourage residents to convert from ICE vehicle CPZ permits to EV permits.	Medium Term	LBTH parking revenue
Make use of underutilised housing estate land	Install EVCP's in some of the social housing parking provision. Currently 766 unutilised parking bays	EV bays installed on housing land for use by public and residents. Potential income for housing from lease deals.	Tower Hamlets Homes owns large areas of land within the borough, including 788 parking spaces which are currently not rented. These underutilised bays could be repurposed as public electric vehicle charge points. Alternatively bays could be electrified to encourage EV ownership amongst residents of THH's 21000 residential properties.	Medium Term	GULCS and Parking Revenue
Page 47 Remain cost neutral	Sign up to Source London leasing and profit share agreement.	Annual income from Source London chargers	Blue Point Ltd offer an annual payment for each charger operating within a borough. This income should be used to support additional chargers in non-commercially viable locations such as residential chargers.	Short Term	Cost positive. Will generate income stream
	Make use of GULCS and other OLEV funding.	Funding for 75% of installation costs	GULCS and other OLEV grants are available to cover 75% of EVCP installations. Best use should be made of this funding stream.	Short Term	GULCS
	Make use of section 106 / planning policy to fund public chargers in new developments	Income for provision of chargers at no cost to the council	Planning policy can be used to obligate developers to contribute to EV charging. This can take the form of specific installations via section 106 or a contribution to EV infrastructure overall via CIL or a strategic electric vehicle charging infrastructure fund.	Medium Term	S.106
	Seek additional funding sources to support roll out of EV charging infrastructure	Identify options for sponsorship of EVCP's funding by GULCS and rapid chargers. Seek partnerships and trial opportunities to pilot emerging and innovative EVCP technologies in the borough.	The charging point unit, including lamp column chargers could accommodate sponsorship income potential which would support the longer term viability of increasing the installation rate of EVCPs. Such as increasing the viability of locating new EVCP's in areas where there is not an identified EV owner or potential customer based. Embrace trial opportunities for new and emerging EVCP technologies. Including sourcing renewable energy sources to address predicted rising demands on national grid. Has tidal flow energy generation from the River Thames being considered as an alternative energy source for EV charging?	Medium term	Advertising
Adhere to London Plan EV requirements	Ensure enforcement of 20% active requirement.	20% active and 20% passive provision at all new developments	The 20% active, 20% passive EVCP provision required of new developments in the London Plan is vital to the overall EV strategy in LBTH, where there are large volumes of new development planned.	Short Term	COST NEUTRAL
	Review Updated London Plan when released	Any new policies to be integrated into EV strategy. New draft London Plan scheduled for consultation publication in Autumn 2017.	It is expected that the revised London Plan will include EV policies. LBTH should review the document as soon as it is available so that the EV strategy can be adapted accordingly.	Medium Term	COST NEUTRAL

Incorporate EVCP Strategy recommendations in development of LIP3 and related Air Quality and carbon reduction strategies	Ensure EVCP infrastructure implementation is incorporated into the policies, deliver plans and identified funding mechanism for LBTH's LIP3 proposals.	Ensures opportunities to deliver EVCP infrastructure are effectively identified and efficiently funded.	The LIP3 process will progress in earnest during 2018.	Short Term	LIP / Staff resource
	Ensure the recommendations of this strategy are delivering in conjunction with the proposals identified in LBTH's Air Quality Management Plans.	Supports delivery of objectives for both strategies	Strategies complement each other. This strategy supports the delivery of several actions identified within LBTH's Air Quality Management Plan, relating to electrifying Council fleets, green procurement, LIP3 policies for local solutions through the delivery of Healthy Streets and Liveable Neighbourhood schemes. All the Cleaner transport actions are supported as well as identifying lobbying and partnership opportunities.	Short and Medium Term	LIP / MAQF

Page 4 of 8 review EV strategy and adapt to new developments in the field of EV	Carry out a review of EVCP strategy by 2020/21 to ensure delivery of action plan targets and proposals.	Review and revise strategy in 2020/21 in response to EV demand, technological and policy developments. To be assessed against achieving the following targets:	Target to increase number of EVCPs across LBTH to 50 by end of 2020/21.	Short, Medium and Long Term	LIP + European bid opportunities
		<ul style="list-style-type: none"> • Increase EV car ownership share to 2% by end of 2020 • Installed 50 EVCP's across LBTH by 2020/21 (by March 2021) Trial innovation emerging EV charging technologies: <ul style="list-style-type: none"> • Seek funding opportunities and partnerships to trial emerging charging technologies such as wifi and inductive loop charging. (both regional, national and international (through LEPT) • Work with TfL and bus operators to ensure LBTH bus routes are prioritised for the roll out of EV bus service fleets. Identification of viable bus stand locations for the installation of rapid and inductive/wireless charging opportunities should assist this process. • Support the Mayor of London's proposals to expand the ULEZ and other measure to reduce vehicle emissions, such as the introduction of a diesel scrappage scheme. 	<ul style="list-style-type: none"> • Interim target for 2018/19 to have installed 15 EVCP's. • Interim target for 2019/20 to have installed another 15, bring total to 30 new EVCPs. • Interim target for 2020/21 to have installed a further 20, bring total to 50 EVCP's installed over 3 year period from 2018/19 to 2020/21. EVs and EVCPs technology is a rapidly evolving industry and policy needs to adapt to embrace new approaches. To ensure LBTH is providing the best possible infrastructure it must continue to periodically monitor developments and update strategy accordingly.		

APPENDIX A – Proposed EVCP Locations

APPENDIX A:

EVCP Site Selection Criteria for LBTH :

The proposed sites represent 35 locations at which it will be easiest to implement the initial round of EVCPs. Focus was on car parks, key routes into London and areas frequented by taxis, and initial feedback for on-street locations where there is less parking stress, which would be suitable for residential charging points. At least 150 sites will be required to obtain a good geographical spread. The following criteria have been used to guide the selection process:

- TfL demographic model used to indicate demand
- Residential areas where less on street parking street
- Areas with high concentrations of existing EV permits (existing demand)
- Proposed new developments
- LEN area
- Retail/Commercial areas
- Taxi Ranks and taxi hotspots
- Arterial routes into London
- Position of existing chargers
- Parking Stress (avoided where possible)
- Car parks (prioritised)
- Housing estate land has been excluded (although we recommend it is utilised in the future)

Location details:

	Location	Type	No. Of Points	Description
1	Epsom Street Car Park	Rapid	2	Small car park, Just off A12
2	Payne Road	Rapid	1	In existing permit bay outside Bow Baptist Church.
3	Tesco, Three Mil Lane	Fast or Rapid	Multiple	One existing 3kW charger in large car park. Potential to greatly expand provision.
4	Layby under Lowe Lea Crossing	Rapid	2 or more	Close A13 junction
5	Electron House Layby	Rapid	1	Close A13 junction
6	Wick Lane	Rapid	1	Industrial area close to A12. Kerb build out required in existing permit bay or SYL
7	Maplin Street Taxi rank	Rapid	1	Taxi rank adjacent to Mile End Station
8	Vehicle Testing Centre	Rapid	1	Just off A13 junction



9	Victoria Park Car Park	Fast	1	Council owned, public car park
10	Roman Road Car Park	Fast	1	Council owned, public car park
11	Mile End Stadium	fast and rapid	Multiple	Public, large car park, close to mile end and commercial road
12	John Orwell Sports Centre	Fast	1	Small car park. An off road location in area of high parking stress.
13	Lidl	Fast	1	Large car park, close to Commercial Road / A13.
14	Asda, Isle of Dogs	Fast	Multiple	Large car park, in residential / commercial area. Near cross harbour station.
15	Sainsburys, Whitechapel	Fast	Multiple	Just off Mile End Road. Key route into the City.
16	Anchor Retail Park	Fast or Rapid	Multiple	Large car park in retail park of Mile End Road.
17	Arbour Square	Fast	1	A concentration of EV parking permits
19	Winterton House Estate Car Park	Fast	1	Close to Watney Market, just off commercial road
20	Buress Street On Street Bay	Rapid or Fast	1	Just off Mile End Road - single bay. Key route into the City.
21	Newark Street	Fast	1	Outside Barts School of Medicine, next to loading bay in existing permit bay, wide footway. Ideal for visitors to University or Hospital.
22	Bethnal Green Road Taxi Rank	Rapid	1	Existing P&D bay adjacent to taxi rank outside the Tesco on Bethnal Green Road.
23	Canrobert Road	Fast	1	Around the corner from taxi rank
24	East Smithfield Taxi Rank	Fast	1	Convert one of the three taxi ranks outside the Royal Mint into an EV charging bay.
25	St. Stephan's Road	Rapid or Fast	1	Use end of shared use bay north of taxi rank. Requires kerb build out.
26	Trinity Square	Fast	1	Covert taxi rank bay outside of No.43 to EV. Close to Tower Hill Station.
27	Dunbridge Cab Company	Fast	1	Dunbridge Street Cab Repair Garage forecourt.

28	Devons Road	Fast / Rapid	1	Bays outside of Bow Taxi's garage, alternatively bay at end of Rainhill Way. Suitable for Taxis and residential charging.
29	Dellow Street	Fast	1	Opposite Shadwell Station in existing P&D bay at wide point of footway. This area as a cluster of EV parking permits.
30	Westferry Road	Fast / Rapid	1	Layby at end of Millway Outer Dock currently with two residents bays.
31	Stafford Street	Fast.	1	Next to existing car club bay.
32	Tredegar Square	Fast or Lamp post	Multiple	Several options. Alongside car club bay for example.
33	College Terrace	Fast or Lamp column	1	On defunct school keep clear marking
34	Chisenhall Road	Lamp Post / Fast	Multiple	Low parking stress residential area ideal for lamp post charging or a fast charger outside of Chisenal Studios.
35	Driffield Road	Fast	1	Area around the Boris Bike station.

Award Winning

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transport awards

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parking
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Accreditations



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Tower Hamlets Autism Strategy for Adults 2017-22

1. TOWER HAMLETS AUTISM STRATEGY FOR ADULTS 2017-22: SUMMARY

1.1 Background

It is estimated that around one per cent of the adult population have Autism Spectrum Disorder (ASD). It is a condition that is characterised by impairments in social interaction, social imagination and communication. Autistic adults can experience difficulties in life, and are more likely to experience problems related to things like health, housing and crime. This strategy sets out how the Council, health services and others will help autistic adults between 2017 and 2022.

1.2 Aims

Our vision locally is the same as the government's vision, which is as follows:
"All adults with autism are able to live fulfilling and rewarding lives within a society that accepts and understands them. They can get a diagnosis and access support if they need it, and they can depend on mainstream public services to treat them fairly as individuals, helping them make the most of their talents¹."

1.3 Objectives

The eight objectives we will work on in order to improve things for autistic adults are to:

- 1) Help autistic people to feel like part of their community
- 2) Help autistic people access good quality health and social care services
- 3) Support young people with autism to transition into adulthood
- 4) Raise people's skills and knowledge in relation to autism
- 5) Help autistic people to find and keep work
- 6) Help autistic people to live in good quality housing that meets their needs
- 7) Reduce and improve autistic people's interaction with the criminal justice system
- 8) Help those who care for friends and family with autism

1.4 How we will make this happen

We will set up an Autistic Adults Partnership Board to make sure that this strategy is put into place. We are really keen to make sure this Board includes autistic adults and their carers.

2. INTRODUCTION

2.1 Autistic Spectrum Disorder (ASD) is a lifelong developmental disorder, characterised by impairments in social interaction, social imagination and communication. Autism is a spectrum condition, which includes autism and Asperger's syndrome. Research and feedback indicates that autistic adults can have needs in a range of areas that relate to health, social care, housing,

¹ 2010 Adult Autism Strategy *Fulfilling and Rewarding Lives – Vision statement*

the criminal justice system and social inclusion. This strategy aims to address these needs, setting out how the Council, health services and others will help autistic adults between 2017 and 2022.

2.2 Throughout this strategy, the phrase “autistic adults” or “autistic people” is used in preference to “adults with autism” or “people with autism”. This is in line with feedback from autistic people.

2.3 This strategy is a partnership strategy. It is held by the Council and the Tower Hamlets Clinical Commissioning Group, and has implications for other services, such as the criminal justice system. As such, it sets out the collective vision for autistic adults in the borough.

3. BACKGROUND INFORMATION

3.1 The number of autistic adults

3.1.1 Autism in adults is often under-diagnosed, under-reported and misdiagnosed, largely due to the social and communication difficulties associated with the condition².

3.1.2 Recent estimates suggest that there are around 450,000 adults nationally living with autism. This equates to 1.1% of the population. The rate of autism among men (2.0 per cent) is higher than among women (0.3 per cent). The current evidence suggests that the prevalence of autism in adults who also have learning disabilities is between 7 per cent and 20 per cent.

3.1.3 In 2015 there were thought to be almost 2,300 adults with ASD in Tower Hamlets³. This equates to 0.8% of the population. However, this figure is an estimate and therefore needs to be approached with caution. It is estimated that around half of this group have a learning disability.

3.1.4 Evidence suggests that the number of children and young people diagnosed with autism has grown rapidly in recent years, and according to staff feedback, autism is now one of the three most common long-term conditions affecting children. Inevitably, as this group get older, we can expect the number of adults with autism to increase accordingly. In an environment of restricted public resources, one of the aims of this Strategy is to set out how we can address an increase in demand in a sustainable way. Moreover, early intervention for children and young people with Special Educational

² Tower Hamlets JSNA Factsheet – Adults with Autism Spectrum Disorder (2016) Peter Lamb

³ 2125 adults 18-64, 153 aged 65 or over. Source: Tower Hamlets JSNA Factsheet – Adults with Autism Spectrum Disorder (2016) Peter Lamb

Needs or Disabilities (SEND), many of which will transition into Adult Services, is a priority in the SEND strategy.

3.2 The characteristics of autism spectrum disorder

3.2.1 One of the main characteristics of autism is difficulties with social interaction and communication. Another characteristic of autism relates to restricted and repetitive patterns of behavior, activities or interests. Some people with autism can display challenging behavior. This can include physically aggressive behaviour, but can also include other behaviours that have a negative impact on themselves or others.

3.2.2 It is recognised both nationally and locally that there is work to be done to improve public and professional understanding of autism. People with autism can experience social isolation, stigma or bullying.

3.3 The needs of autistic adults

3.3.1 A spectrum of needs

Autism is a spectrum condition, so whilst all autistic people share certain difficulties, being autistic will affect different people in different ways. For example, it is plausible (though it is not quantifiable) that only a small proportion of autistic adults will meet the eligibility threshold for support from adult social care. Feedback from staff is that high functioning people with autism can be at risk of falling “under the radar” of support services, which can then lead to preventable issues escalating unnecessarily.

3.3.2 Accessing and using care and support

Feedback at a national level suggests that people with autism do not always get the help they need from adult social care, and do not always have a positive experience. Locally, there are systems in place to help identify and support autistic people to get the support they need. There are two main ways that people are identified: Adults may have been diagnosed as children and be in contact with Children’s Social Care, in which case staff will work together to manage the transition to adult social care. Alternatively, the Tower Hamlets Autism Diagnosis and Intervention Service is there to help identify adults with autism who have not yet received a diagnosis. The total number of referrals (including self-referrals) for diagnosis since the start of the project to end of 2015-16 is 221⁴. Once identified, adults with autism are subject to the same eligibility criteria as everyone else in relation to receiving a care package. Despite this, records show that as of March 2016, less than

⁴ Tower Hamlets JSNA Factsheet – Adults with Autism Spectrum Disorder (2016) Peter Lamb

one per cent of the people receiving a care package from adult social care had autism⁵, although there may be issues with the accuracy of this data.

The 2014 Care Act introduced a legal duty on local authorities to provide preventative support in relation to adult social care. A range of services are funded with this in mind, including the post-diagnosis support offered to adults with autism by the Tower Hamlets Autism Diagnosis and Intervention Service. However, there is arguably less tailored preventative support available for adults with a pre-existing autism diagnosis.

3.3.3 Accessing and using health services

As well as having symptoms related to autism, people with the condition also suffer from the same general types of physical and mental health problems as everyone else in the community. However, because of their autism they are at an increased risk of ill health than the general population. For many people with autism, mainstream health services can be hard to access⁶. This can be due to a lack of understanding of autism among staff in those services but there are other contributory factors. Putting in place reasonable adjustments can ensure that adults with autism are able to benefit fully from mainstream health services to live independently and healthily.

The health community need to ensure that GPs, as the gatekeepers to diagnostic services and other referrers, such as mental health teams, have a good understanding of the whole autistic spectrum and the diagnostic pathway that has been developed in Tower Hamlets. This will enable adults with autism to be supported more effectively from the start of their assessment process.

3.3.4 Housing

Housing can play a vital role in supporting autistic people to maintain good health, independence and improve their quality of life.

A survey by the National Autistic Society showed that 49% of adults with autism still live with their parents⁷. This may reflect the fact that many autistic

⁵ The 2015-16 SALT return indicated that there were 15 adult social care users with autism as a reported health condition as of 31.3.16, out of approximately 3,500 adult social care users. It should be noted that there were approaching 3000 clients for whom no health condition was recorded. This may be an accurate reflection of the situation, but it is also possible that there are issues with staff recording this information on Framework-I (the client database used in adult social care)

⁶ Westminster Commission on Autism, Inquiry into Access to Healthcare for Autistic People 2016

⁷ Barnard, J. et al (2001). Ignored or ineligible? The reality for adults with autism spectrum disorders.

people require ongoing support into adulthood due to their needs or that support to help them live independently is limited. Secondly people with autism may also live in accommodation that is unsuitable for them e.g. in terms of environmental factors such as noise and space. Inappropriate housing can reduce their ability to live independently.

There is no supported housing, extra-care sheltered housing, residential care or nursing care provision in the borough that is targeted solely at autistic adults. There is no evidence available which indicates how many people need this now or are likely to need it in future. For this reason, an important first step is to build up a clearer picture of the housing-related support needs of autistic adults now and in future. This can then be used to decide what supported housing models might need to be developed in future.

Locally, the way that we meet the housing needs of autistic people in Tower Hamlets is currently undergoing change. The needs of autistic people living in the community in Tower Hamlets are addressed as part of the 2017-22 Tower Hamlets Housing Strategy. The new local Housing Strategy has specifically recognized the needs of people with learning difficulty and autism and contains a commitment to work to support the development of an Accommodation Plan for People with Learning Disabilities and autism.

3.3.5 Criminal Justice System

It is estimated that a disproportionately high number of prisoners have autism. Some studies suggest that between two and four per cent of offenders have autism⁸. Autistic people are also thought to be more likely to be a victim of crime, with one report suggesting that they are seven times more likely to experience this.

There are already a range of measures in place to help identify and support autistic people who are in contact with the criminal justice system. However feedback suggests there can be issues with these practices. There is also room for improvement in terms of how staff in the criminal justice system understand autism overall, and their knowledge of where to signpost or refer autistic people to in Tower Hamlets.

3.3.6 Employment

Autistic adults are significantly underrepresented in the workforce. Nationally, only 16% of autistic adults in the UK are in full-time paid

⁸ 'A Whistle-Stop Tour of ASD and vulnerability for involvement in criminality' (Richard Mills) September 2013

employment⁹. 32% of autistic adults in the UK are in any kind of paid work, compared to 47% of disabled people and 80% of non-disabled adults¹⁰. Only 10% of autistic adults receive employment support, but 53% say they want it¹¹.

Local employment levels for autistic people are not known¹². An employment support service is available for autistic people in the borough¹³. This support includes supporting autistic people to develop their CVs, support to search and apply for work, confidence-building, job coaching and training. The service also looks to build relationships with potential employers (for example, developing work placements) to expand work opportunities for people with autism. Between November 2015 and November 2016, the employment support service helped four adults with higher functioning autism into employment, helped six more to sustain their existing jobs, and helped three to go into higher education. The service helped 10 adults with lower functioning autism into employment¹⁴.

National and local feedback indicates that autistic people can experience a range of barriers in relation to employment. Recruitment processes can be daunting and difficult to get through and employers may not have a good understanding of how to make reasonable adjustments for autistic employees.

Carers of people with autism can also find it difficult to work. According to 'Ambitious about Autism', only 11% of carers of children with autism work full-time, whilst 70% say that the lack of appropriate care facilities stops them working.

3.4 Autism - National, local policy context

3.4.1 The 2009 Autism Act

⁹ National Autistic Society (2016) *The Autism Employment Gap*

¹⁰ National Autistic Society (2016) *The Autism Employment Gap*

¹¹ Bancroft et al (2012). *The Way We Are: Autism in 2012*. London: The National Autistic Society

¹² Employment levels for people with a mental health or mental health problem who are in contact with social care are recorded, but this does not specify if someone also has autism, and does not include employment rates for people who have autism only. In 2015-16, 4.9% of adults with a learning disability receiving long-term support were in paid employment, equating to 28 people. 4% of adults in contact with secondary mental health services are in paid employment, compared to 5% last year and an average of 7% across England. 93% are living independently, compared to 92% last year and an average of 59% across England.

¹³ The Tower Hamlets Jobs, Enterprise and Training service is commissioned by the Tower Hamlets Autism Diagnostic and Intervention Service to provide this service

¹⁴ Records are not kept as to how many adults with lower functioning autism have been supported into higher education, but the service estimates this to be about 10 people.

The 2009 Autism Act was the first ever disability-specific law in England. The law said that the Government must produce an autism strategy, and must set out what health and social care have to do to put the strategy into place. The government did this in 2010, and more details are set out below.

3.4.2 The national autism strategy

In the UK: The government first published an autism strategy in 2010, called 'Fulfilling and Rewarding Lives', in 2010. Since then:

- An updated autism strategy and a progress report has been published, most recently in 2016¹⁵.
- Government guidance setting out what local authorities and health services must do to meet the needs of people autism, most recently updated in in 2015.

The strategy sets out 15 priority challenges for action.

In Tower Hamlets: A self-assessment to assess progress in Tower Hamlets against the national strategy was last completed in October 2016. This self-assessment identified a number of areas of good practice, and a number of areas for improvement. This strategy aims to ensure that we are working in line with the national autism strategy in Tower Hamlets, and to work on those areas identified through the self-assessment as areas for improvement.

3.4.3 The 2014 Care Act

In the UK: The 2014 Care Act introduced a number of legal changes to adult social care. These legal duties apply to all adults, including those with autism, and have largely been welcomed. Amongst other things, they mean that autistic adults and their carers should find it easier to find information and advice related to adult social care and should have access to services that help them stay as well as possible for as long as possible. If an autistic person or their carer has a significant need of care and support (as defined in the Care Act), they should receive this.

In Tower Hamlets: We put in place a programme of work to make changes following the 2014 Care Act. The changes that have been made apply to all adults. However, feedback indicates that we could do more to address the specific needs of adults with autism within the work we do. We also know that we could do more to support young people who are not yet 18 years old. This Strategy includes actions to address these issues.

¹⁵ <https://www.gov.uk/government/publications/progress-report-on-strategy-for-adults-with-autism>

3.4.4 The Transforming Care Programme

In the UK: The 'Transforming Care Programme' seeks to improve services and support for people with a learning disability and/or autism who display behaviours that challenge. One of the main aims of the programme is to replace more in-patient services with community-based services for this group, in the wake of things like the 2011 Winterbourne View scandal¹⁶. There are two main documents that describe the programme in more detail:

- 'Building the Right Support', which is the national plan setting out what needs to change¹⁷, and
- A 'Service Model'¹⁸, which sets out what good health and social care services look like.

Collectively, these documents want things to improve for people with autism who have challenging behaviour, so that there is:

- More choice for people and their families, and more say in their care;
- More care in the community, with personalised support provided by multi-disciplinary health and care teams;
- More innovative services to give people a range of care options, with personal budgets, so that care meets individual needs;
- More intensive, early support for those who need it, so that people can stay in the community, close to home;
- Things in place to make sure that people who need in-patient care only get this for as long as they need it.

In Tower Hamlets: The Tower Hamlets Clinical Commissioning Group – in partnership with others - is leading on the implementation of the Transforming Care Programme in Tower Hamlets, which is overseen by the regional Transforming Care Board. The intention is to continue to develop community-based services to prevent people with challenging behaviour being admitted to in-patient facilities, and to design these services so that they are person-centered in line with the Transforming Care Service Model.

3.4.5 Funding and resources

A number of public services are experiencing a restriction in resources in real terms. The local authority, for example, has been required to save £138 million between 2010 and 2016, and needs to save a further £58 million by 2020. This strategy has been written with an awareness that resources are restricted, and aims to put the resources available to public services to the best possible use.

¹⁶ Winterbourne View was a private hospital. In 2011, a BBC Panorama programme uncovered abuse taking place in the hospital.

¹⁷ <https://www.england.nhs.uk/wp-content/uploads/2015/10/ld-nat-imp-plan-oct15.pdf>

¹⁸ <https://www.england.nhs.uk/wp-content/uploads/2015/10/service-model-291015.pdf>

4. CURRENT SUPPORT FOR AUTISTIC ADULTS IN TOWER HAMLETS

- 4.1 Tower Hamlets Autism Diagnosis and Intervention Service was established in May 2014 to diagnose autistic adults. It is part of the East London NHS Foundation Trust (ELFT) and is currently funded through the Better Care Fund¹⁹. The service offers a number of interventions to adults who have recently been diagnosed with autism. These can be psychological interventions, support with speech and language, or interventions from an Occupational Therapist or Social Worker. The service can also help with things like housing, benefits, social communication skills and independent travel training; and can refer people onto other services as appropriate. It should be noted that these interventions are available to adults after they have received a diagnosis: They are not available to adults with a pre-existing diagnosis.

Tower Hamlets Autism Diagnosis and Intervention Service commission the Tower Hamlets Jobs, Enterprise and Training (JET) service to provide employment-related support to people with autism in the borough.

- 4.2 Staff in a range of organisations in Tower Hamlets have been offered support and training in the past in relation to how they work with autistic people. The local authority has previously provided training, which has been targeted at Council staff. The Tower Hamlets Autism Diagnosis and Intervention Service has also provided training to staff at the East London NHS Foundation Trust and externally where requested. The service can also provide support to external professionals in relation to individual cases.

5. OUR AIMS AND OBJECTIVES

The aim of this strategy is to meet the ambition of national autism strategy for autistic adults in Tower Hamlets, so that:

All adults with autism are able to live fulfilling and rewarding lives within a society that accepts and understands them. They can get a diagnosis and access support if they need it, and they can depend on mainstream public services to treat them fairly as individuals, helping them make the most of their talents²⁰.

¹⁹ The Better Care Fund is an annual budget jointly held by the local authority and Clinical Commissioning Group.

²⁰ 2010 Adult Autism Strategy *Fulfilling and Rewarding Lives – Vision statement*

We have identified eight objectives in relation to this aim. We think these are the main areas we need to work on in order to improve things for autistic adults, based on research and feedback.

Objective 1: Help people with autism feel like part of their community

Main themes

- Autistic people may not feel like an accepted part of their local community and are more likely to feel socially isolated
- Staff who work for local organisations may not always understand autism, so may not always help people as much as they could.
- Many people with autism will not need specific support from health or social care, but they may still need others to understand how autism affects them
- Health and social care will tailor information for people with autism when we are asked to²¹, but general information provided by public services is not always easy for people with autism to understand.

What we will do

- We will use “World Autism Awareness Week” each year to raise awareness of autism. We will run a public awareness-raising campaign at this time to help combat stigma and discrimination around autism.
- We will encourage organisations to be “autism-friendly”, where quiet spaces with limited sensory distractions will be provided along with clear information. We will look to have these in GP surgeries, Idea Stores and One-Stop Shops to start with.
- We will offer training to staff who work for local organisations on autism. There are more details in Objective 4.
- We will provide good quality, online information and advice on autism that is available for everyone to read and make use of. We will develop this in partnership with those with autism.
- We will try harder to produce information and advice that is clear, useful and easy to understand for people with autism. We will do this with our partners where it is appropriate to do so.

²¹ In line with the NHS England Accessible Information Standard and our Accessible Information Policy

Objective 2: Help people with autism access good quality health and social care services

Main themes

- The Autism Diagnosis and Intervention Service in Tower Hamlets can diagnose autism and can help people following this diagnosis for a limited period of time.
- The Service is funded one year at a time through the Better Care Fund, which can make staff recruitment difficult.
- There may be a number of women and older people who have autism living in Tower Hamlets who have not yet been diagnosed as such.
- The number of people with autism who will need help from health and social care is likely to go up in future.
- Only a small number of people with autism are likely to need ongoing support from adult social care. However, many more may benefit from using the “preventative” services that adult social care funds.
- Social care services sometimes categorise people as having a “learning disability”, “physical disability” or “mental health issue”, and can struggle to know where to place people with autism
- Very few referrals to the Tower Hamlets Autism Diagnosis and Intervention Service come from adult social care at the local authority.

What we will do

- We will encourage more women, older people and people with English as a second language who suspect they have autism to come forward for an assessment. We will do this through awareness raising and training.
- We will support people with autism who have challenging behaviour through our ‘transforming care programme’. This includes offering support to people with challenging behaviour and their carers who are in a crisis²²
- We will aim to fund a Tower Hamlets Diagnosis and Intervention Service on a more longer-term basis
- We will change the role of the Tower Hamlets Diagnosis and Intervention Service so that interventions can be offered to someone with a pre-existing diagnosis of autism, and can be offered to them more than once
- We will offer person-centred social care and choice to those who are eligible for adult social care, including the offer of direct payments so that people can purchase their own care and support
- Through training, we will make sure that staff in *all* social care teams are able to support people with autism (not just the Community Learning Disability Service or Community Mental Health Teams)

- ~~We will look into the idea of having peer mentors for people with autism. They will~~
²² This could mean the provision of specialist challenging behaviour support. One model could be a team of senior support workers supervised by a behavioural psychologist. Respite provision could also be looked at.

have autism themselves, and can help others by doing things like going with them for appointments.

- We will encourage adults with autism to set up user-led support groups
- We will add information on services for people with autism, including autism-friendly universal services to online service directories, including the Community Catalogue in adult social care
- We will strengthen the links between the Autism Service and the Council so that staff are working more closely together. We want to see more referrals from the Council and other agencies being made to the Autism Service.
- We will identify a health lead to make reasonable adjustments to reduce barriers for autistic people accessing mainstream healthcare services and encourage the use of “annual health checks” with GPs for autistic adults.
- We will modernise day service provision for people with autism who have social care needs, so that services help people to be part of their communities through an increased focus on a more personalised, community focused approach. We will improve the information we record about people with autism in the borough
- We will work towards codesigning and coproducing support services to ensure they are accessible for autistic adults and their carers

Objective 3: Support young people with autism to transition into adulthood

Main themes

- Some young autistic people and their families can feel that there is less support available to autistic adults
- The criteria for being eligible for a support package from adult social care is different to the criteria used in children's social care. This can also result in some people experiencing an end to support once they reach adulthood
- For autistic young people who need ongoing support from adult social care, feedback is that adult social care staff do not always get involved at an early stage

What we will do

- Adult social care in the Council will work with children's social care, in line with The Transition Policy.
- We will work with children's services to ensure appropriate information on the transition pathway is clearly communicated to relevant stakeholders, including parent carers.
- We will work with the Children and Young People ASD Provider Network to strengthen multi-agency planning during the transition period from childhood to adulthood so that young people and their carers are aware of the support they will receive from adult service prior to their 18th birthday.

Objective 4: Raise people's skills and knowledge in relation to autism

Main themes

- Across Tower Hamlets, professionals may not always understand autism. They may not always help people with autism as much as they could, and sometimes may accidentally make things worse.
- Change can be unsettling for people with autism, and they may need particular help and support when going through a big change in their lives.

What we will do

- We will design new online training for professionals on how to work with autistic adults and make reasonable adjustments. We will work closely with autistic adults on this project.
- We will make sure that professionals know that they can contact the Autism Diagnosis and Intervention service for advice on case work
- We will offer training on autism to staff at the Council, Housing Associations, the Police, the Probation Service, and other local organisations
- We will offer training on autism to advocates in adult social care
- We will offer social skills training for adults with autism as part of a preventative offer of support in line with our duties under s2 Care Act 2014.
- We will offer other training to people with autism and their carers where this is needed – for example, training to help deal with challenging behaviour . We will offer this when a person is diagnosed with autism, and when they are going through a big change in their lives (e.g. going from being a child to an adult).

Objective 5: Help people with Autism to find and keep work

Main themes

- People with autism are more likely to be out of work
- Some people with autism can find it difficult to get and keep a job
- Employers do not always understand autism, so do not always help people as much as they could.

What we will do

- We will try to make it easier for people with autism to apply for a local job. We will start by looking at how people apply for jobs in the Council and NHS.
- We will offer training to employers in the borough to help them understand what “reasonable adjustments” they can make. There are more details in Objective 4. We will also let employers know where they can go for more information²³.
- We will work to establish more opportunities for work experience for adults with autism in Tower Hamlets. This includes work experience in the Council and NHS.
- We will continue to support services to help people with autism in the borough find and sustain work, and will look at setting targets in relation to this.
- We will ensure Social Impact Bond (SIB) supported employment also works with autistic adults.

Objective 6: Help people with autism to live in good quality housing that

meets their needs

Main themes

- The design of housing in Tower Hamlets will not always meet the needs of autistic people.
- Some people with autism may need to live in supported housing. At the moment, there is no supported housing in Tower Hamlets aimed at people with autism.
- Staff who work for housing associations may not always understand autism, so may not always help people as much as they could.

What we will do

- We will include autism in the Tower Hamlets Housing Strategy. This is to make sure that when new homes are designed and commissioned, the needs of those with autism are taken into account as much as possible. This will include supported housing and extra care sheltered housing (ECSH).
- We will offer training to staff who work for housing associations on autism. There are more details in Objective 4. Our aim is for each local housing office to have at least one member of staff who has received this training.
- We will work with colleagues to carry out the Accommodation Plan for People with Learning Disabilities (PWLD) and autism.

Objective 7: Reduce and improve autistic people's interaction with the criminal justice system

Main themes

- Autistic people are more likely to be offenders
- Autistic people are more likely to be the victim of a crime
- There are things in place to help identify and support people with autism who may have been arrested , witnessed or been the victim of a crime, but there is also room for improvement
- If an autistic person is suspected of a crime and needs an “appropriate adult” with them from social care, we are not always sending someone with the right knowledge of autism

What we will do

- We will develop Autism Alert cards. People with autism will be encouraged to carry these with them. They will set out the kinds of things that professionals need to be aware of when they are dealing with the person with autism.
- We will improve the provision of “appropriate adults” to the police for adults with autism. We will make sure that the police know to contact the Tower Hamlets Autism Diagnosis and Intervention Service if they need an appropriate adult for someone with autism
- We will offer training to staff in the criminal justice system on autism. There are more details in Objective 4.
- We will see if health and social care staff would benefit from being able to talk to a forensic psychologist if they are working with someone with autism who has been accused of or committed an offence, as part of our work on the Transforming Care Programme.
- We will develop a new Community (Anti-Social Behaviour) Multi Agency Risk Assessment Conference (MARAC). A MARAC is a local, multi-agency victim-focused meeting where information is shared on the highest risk cases of domestic violence and abuse between different statutory and voluntary sector agencies. This will serve as an added, protective measure to help safeguard vulnerable people with ASD from the risk of anti-social behaviour, hate crime, fire related incidents, and financial abuse/fraud.

Objective 8: Help those who care for friends and family with autism

Main themes

- It can be difficult for carers to balance caring with work, and a lot of carers do not work
- It can be difficult for carers to manage the challenging behaviour some people have as part of having autism
- Some carers of autistic people can find it hard to have a life of their own

What we will do

- We will give carers and people with autism advice and information about short breaks and respite care in the home.
- We will help employers think about what they can do to support employees who are caring for someone with autism. There are more details in Objective 5
- We will offer carers training on how to deal with challenging behaviour as part of the planned Carer Academy
- We will let carers of people with autism know about Carer Needs Assessments in social care

6. HOW WE WILL MAKE THIS HAPPEN

We will set up an 'Autistic Adults Partnership Board'. This group can be made up of staff, people with autism and their carers. The group can make sure

that this strategy is put into place. The group will meet regularly from spring 2017 onwards, and can develop a work plan to set out what specific actions will be worked on each year.

7. HOW WE DEVELOPED THIS STRATEGY

7.1 Research

We carried out research on the needs of autistic adults. We looked at national research and information, and local information. A key document was the “Autism Joint Strategic Needs Assessment”, which sets out the needs of autistic adults in Tower Hamlets. This strategy aims to meet the needs identified in research.

7.2 Input from autistic adults and carers

We were keen to have as much input as possible from autistic adults and carers in Tower Hamlets. We advertised a focus group for autistic adults and carers in December 2016. For people who were unable or preferred not to attend a focus group, we also advertised an online survey. The views and experiences we heard have driven the contents of this strategy. We are now committed to making sure we continue to work in partnership with autistic people and carers to put the strategy into place.

7.3 Input from staff

We talked to staff in a range of settings to get their views on what works well for autistic adults in Tower Hamlets and where things need to improve. We talked to staff in social care, health services, the criminal justice system, employment support and in housing. Their views have informed this strategy, and we are keen to continue to work with a range of staff through the planned Autistic Adults Partnership Board.

8. OTHER STRATEGIES AND PLANS THAT ARE LINKED TO THIS

This Strategy has close ties to the following strategies and plans in Tower Hamlets:

- The 2017-18 Tower Hamlets Strategic Plan
- The 2017-20 Health and Wellbeing Strategy
- The 2017 Carer Strategy
- The 2017 Aging Well Strategy
- The 2017 Housing Strategy
- The 2016-19 Children and Families Plan
- The Community Safety Partnership Plan
- The Special Education Needs and Disabilities (SEND) strategy (currently being planned).

When putting this strategy into place, we will work with an awareness of these strategies. This is to make sure that resources are put to the best possible use, and that there is no duplication of resource.

9. **How we will make this happen**

We will set up an 'Autistic Adults Partnership Board'. This group can be made up of staff, people with autism and their carers. The group can make sure that this strategy is put into place. The group will meet regularly, and can develop a work plan to set out what specific actions will be worked on each year.

Gathered via an online survey (26 respondents) and focus groups (10 attendees) in December 2016 & May 2017

General

- People support the idea of staff training on autism and feel it is needed.
- Some people find the label “autism” useful. Others do not, and would actively seek to avoid it. As a result, there was a divide in opinion when it came to “Autism Alert” cards: Some people feel strongly that they would be useful. Others feel strongly that they do not want to use them. Those who like the idea of an Autism Alert card would also like to see IT systems “flag” the issue that a person has autism, so that they do not have to repeatedly explain themselves when contacting public services.
- Some autistic people may actively seek to avoid interaction with services (e.g. primary care). This could be due to previous negative experiences. This can cause problems in getting a diagnosis, and getting post-diagnostic support. Have to think through how to get support to these people.
- People would like to see form-filling that is brief and to the point

Health

- People suggested the idea of having annual Health Checks with GPs
- People suggested that autism awareness training be provided to health professionals, but also frontline staff (e.g. GP receptionists)
- People would like to see:
 - The offer of home visits from GPs or community nurses for autistic people who cannot leave their homes
 - Forms that are brief and to the point
 - The offer of GP appointments that are longer than 10 minutes
 - The offer of GP appointments at quieter times
 - The offer of seeing a consistent GP
 - A reduction in waiting times at the GPs
 - GPs using visual diagrams (e.g. body diagrams, or a picture of the GP) to assist with communication
 - Visitor parking permits for appointment times
 - A write up of appointments so that either themselves or their family can refer to it later
 - Better use of the Hospital Passport book
 - Better support for carers

Housing

- People like that they can reapply for housing on medical grounds
- People would like planning to consider:
 - Access to space (e.g. gardens) for those who are housebound
 - The risks posed by having an open-plan kitchen and living room (it can be easier for autistic people to access kitchen hazards)
 - The risks posed by having balconies in high-rises
 - The risks posed by having locks that are easy to unlock (it can lead to people wandering)
 - Cluttered pavements that can be difficult to navigate through.

- Would be good for people to “make an effort” with their neighbours in order to get support from their communities.

Crime

- There was mention that the British Transport Police are good – people had good experience of them interacting with people with autism
- People would like to see:
 - The system providing quiet and calm spaces for autistic people
 - Criminal justice system staff using communication aids
- People raised the question as to when challenging behaviour becomes criminal behaviour
- People mentioned “mate crime” as an issue facing some autistic people.
- People would like to see quicker access to their family or carers

Social Care

- A number of people recounted that they had received help whilst children, but that this had ended at the point of reaching adulthood. There was a feeling that resources are stretched and that little is available.
- People would like adult social care to consider:
 - Providing people with a consistent Social Worker
 - Staff sending a write-up of meetings after they take place
 - The autism diagnostic service in Tower Hamlets providing support on a longer-term basis
 - Providing support to combat social isolation for autistic people
 - Supporting an occasional informal coffee morning in a safe, quiet space
 - A drop-in service provided in a less formal way may be useful

Society

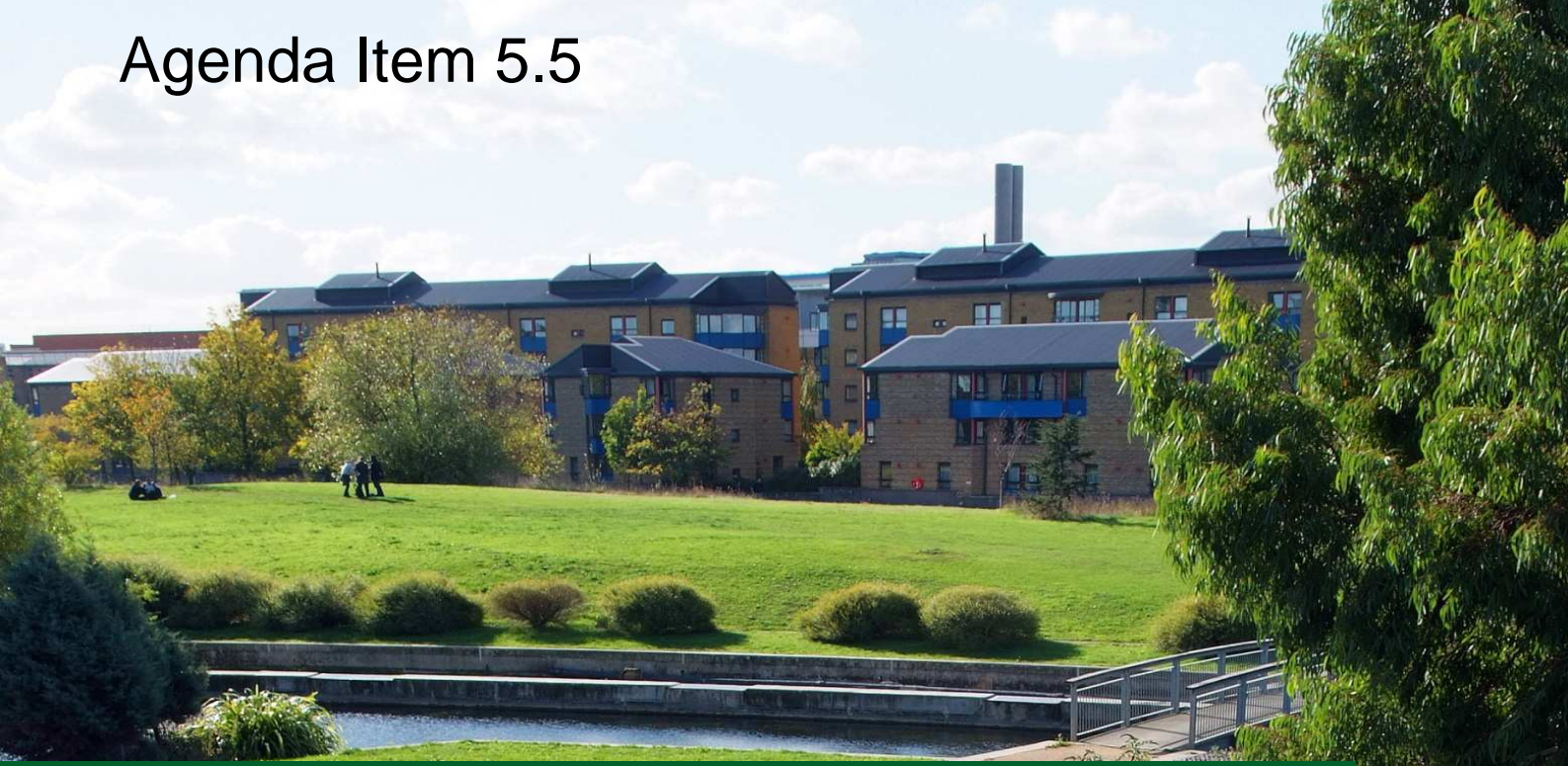
- It would be good to work with local shops so that staff are more aware of how to deal with autistic people and challenging behaviour.
- A peer-led group may be useful to establish.

Employment

- JET Tower Project employment services was praised by a few respondents to the survey as having a real expertise in supporting autistic people with work
- People would like to see:
 - More work placements and employment opportunities for autistic people
 - The opportunity for timely reviews with both parties (employer/employee), separately and together.
 - More CV preparation and interview training, more mentors
 - Support for autistic adults on how to manage social situations at work
 - Application forms that are as brief as possible
 - Support with using public transport, recognising that people may struggle with employment if the travel there is stressful.
 - An ongoing support group led by autistic adults who are successfully employed and can share their positive experiences
- One person mentioned a service in Camden, whereby employers with specific requirements are linked up with autistic people with specific skill-sets. People liked the idea of focusing on the special interests to autistic adults.

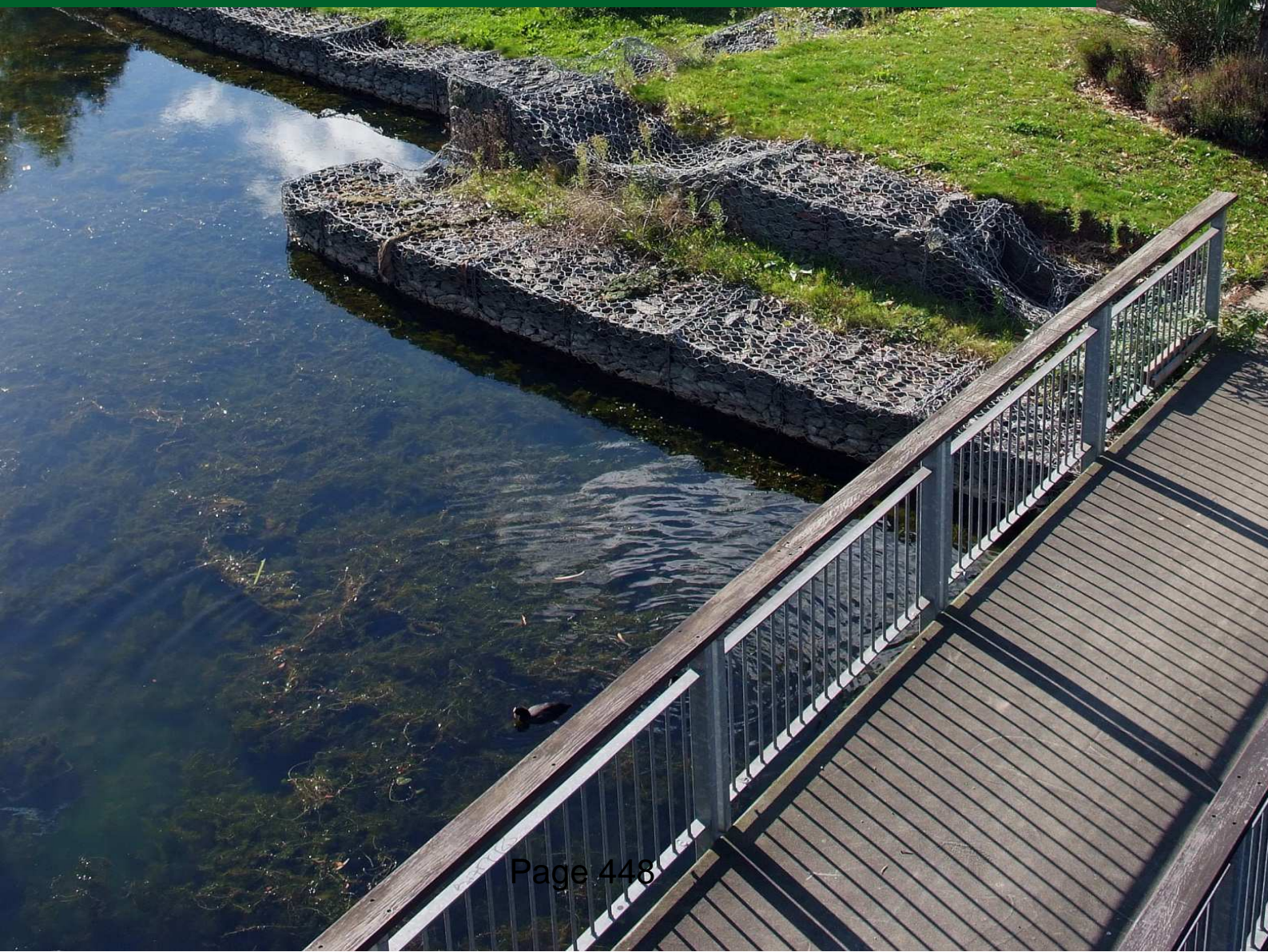
Transitions

- People would like to see:
 - A mentoring system with autistic adults supporting young people with autism to transition into adulthood
 - Sharing options with parents giving a range of alternatives – It was felt that current choice for provision is limited e.g. Tower Hamlets College being only option for education



Parks and Open Spaces

An open space strategy for the London Borough of Tower Hamlets
2017-2027



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READING GUIDE

Chapter 1 sets out the need for an Open Space Strategy, and links open spaces to council priorities.

Chapter 2 is the open spaces assessment. The assessment is positioned in the context of national and regional guidance and is in five distinct parts. Each part includes a methodology, key findings section and conclusions:

- Part A: desktop audit of open space. This part audits the quantity of open space in Tower Hamlets, in line with National Planning Policy Framework guidance.
- Part B: quantitative assessment of the supply of publicly accessible open space. This part assesses the quantity of publicly accessible open space in order to determine whether there is adequate supply of publicly accessible open space.
- Part C: GIS mapping to determine catchment areas for publicly accessible parks. This part draws on London Plan guidance to map pedestrian accessibility to parks and open spaces in Tower Hamlets, in order to identify areas of open space deficiency in the borough.
- Part D: is an external assessment of the quality and value of open spaces, which the Open Space Strategy guidance recommends is carried out.
- Part E: is an external assessment of playing pitches and outdoor sports facilities in Tower Hamlets.

Chapter 3 is an assessment of the views, needs and expectations of residents in relation to open spaces.

Chapter 4 is an analysis of current and future local demand for open space drawing on population and demographic trends for Tower Hamlets.

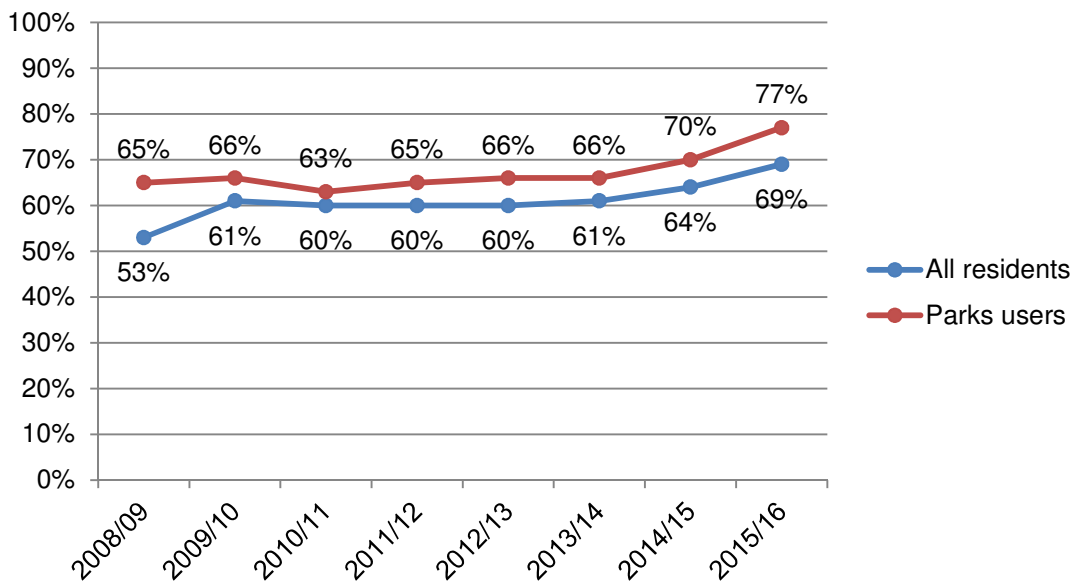
- Part A: demographic change. This part looks at demographic changes that are expected to take place in Tower Hamlets.
- Part B: future demand for open space. This part assesses future demand for open space, including playing pitches and outdoor sports facilities in Tower Hamlets.
- Part C: considers options for prioritising investment in existing open space and ways of ensuring existing open space can be made more resilient for the future.

Chapter 5 outlines an action plan for parks and open spaces covering the first five years of the strategy.

INTRODUCTION

Tower Hamlets has more than 200 parks and open spaces of which more than 170 are publicly accessible. The majority is owned and managed by the council. Parks and open spaces are popular with local residents and visitors to the borough. Their broad appeal is reflected in high satisfaction ratings from residents, which have been steadily increasing for the past three years. Conversations with residents indicate that parks are valued for a variety of reasons including the positive impact they have on health and wellbeing.

Figure 1: Percentage of residents satisfied* with Parks and Open Spaces, according to the Annual Residents Survey



*'Satisfied' means the service was rated good, very good or excellent.

Tower Hamlets parks also host events which attract visitors from across the country: they have an Olympic Legacy and contain sporting facilities which inspire people of all ages to enjoy physical activity. Tower Hamlets parks provide access to local wildlife, inspiring people from all backgrounds to learn more about nature and the environment. Many of them have a rich historical heritage, and there are memorials and art available to view at parks and open spaces throughout the borough. Parks and open spaces play an important role in helping to address air pollution and mitigate the effects of climate change.

Our parks are free to use and can be equally enjoyed by all. They contribute to physical and mental health, by providing space for residents of all ages and from different circumstances to enjoy. They also play an important environmental role through pollution control and flood management.

The parks and open spaces within the London Borough of Tower Hamlets have a rich history, with the origins of many dating back to the 18th and 19th century as initiatives to combat overpopulation and improve the quality of life

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for those in the community. Of the total number of parks sites within the Borough, five are Registered Historic Parks and Gardens with listed status ranging between Grade II* to Grade II, 16 are protected London Squares and 52 are sites of historic interest, all of which contain a number of listed structures within the parks and open spaces. Some sites, such as the Altab Ali Park, have attained important cultural significance for community cohesion and equalities.

The biodiversity of Tower Hamlets is also rich and includes rare and protected species, such as the Black Poplar (Britain's rarest native timber tree), the nationally scarce Brown-banded Carder Bee, the Streaked Bombardier Beetle (recorded recently from only four UK sites), bats, Great Crested newts and the Black Redstart.

Since the last strategy in 2011, Victoria Park has been the nation's favourite park. Residents have given up their time to volunteer in parks and helped to shape our network of parks and open spaces by participating in consultations. Our open spaces continue to attract investment and develop to meet the needs of the changing population and - new open spaces have been created - despite the pressures on the limited land available for development in Tower Hamlets. The borough's nationally recognised spaces now include English Heritage sites, open spaces with Green Flag Awards and listed buildings, all of which bring crucial investment into the local economy through tourism. Our parks also have a growing network of activities and volunteering groups in parks.

In the coming years, the population of Tower Hamlets is projected to grow and in tandem, the demand for housing and open space will increase. It will become more challenging to meet the demands for new space – particularly in the context of the council's plan to make financial savings. To ensure residents and those visiting the borough continue to have access to high quality open space, creative ways of delivering and maintaining open spaces will need to be championed by the council and robust evidence will be needed to secure decent open space provision wherever possible. This strategy evidences the need for open spaces, and sets out strategic actions in response to that evidence for the next ten years.

CHAPTER 1: THE CASE FOR AN OPEN SPACE STRATEGY

1.1. CHAPTER OVERVIEW

This chapter outlines the national and local context in which the Open Space Strategy is being updated.

In the context of population growth and financial pressures the chapter outlines the need for a revised Open Space Strategy for 2017 to 2027:

- To manage the impact of population growth on the provision of open spaces
- To attract and guide investment in parks and open spaces to the best effect for Tower Hamlets
- To contribute to sustainable development
- To address competing demands on parks and open spaces
- To mitigate the revenue costs for the council of hosting parks and open spaces in Tower Hamlets

The chapter outlines the role of the strategy in delivering council priorities for the next 10 years, with particular regard to development and health and wellbeing.

The chapter also sets out the limitations to the strategy and how the strategy has been developed.

1.2. THE NEED FOR AN OPEN SPACE STRATEGY IN 2017

Substantial investment in open spaces in the last strategy period has resulted in increased resident satisfaction. However, while during the last strategy period open space quantity increased overall, it could not keep pace with population growth. As a result, the amount of open space per resident is reducing.

Providing open space will continue to be a challenge in Tower Hamlets - even with investment, rapid population growth is a challenge for the provision of open space. Tower Hamlets population is set to grow by 26% in the next 10 years rising to an estimated 374,000 by 2026. Further pressure on open space will come from those visiting and working in the borough, with key employment locations expected to see growth. Tower Hamlets will continue to have some of the most deprived areas in the country. Three-quarters of children in the borough currently live in low-income families and overcrowding is higher than the London and national average, creating acute housing need in the borough. Rising demand for housing means there will continue to be limited opportunity to create new, accessible open spaces - despite a growing need for it. Tower Hamlets also plans to make savings of £59 million from the

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council budget by 2020. This savings target is likely to put pressure on council services in the next 5 to 10 years.

There is evidence that the environment, infrastructure such as parks, and access to open spaces has an impact on health and wellbeing. Making better and more creative use of open space, and improving quality and function, can increase opportunities for residents to use them for healthy activities as well as places to meet and socialise. Residents recognise the valuable role of parks and open spaces, seeing them as places that help to bring people of different backgrounds together and as a place to spend time with family and friends.

The purpose of the Open Space Strategy 2017 is:

[A] Managing the impact of population growth on the provision of open spaces

If we are to meet the twin demands of a growing population and a drive for budget savings Tower Hamlets must robustly evidence the need to provide new spaces. The 2006 and 2011 Open Space Strategies played a crucial role in securing new, accessible, open space against a backdrop of rapid development. This was achieved, in part, by setting out overarching principles to safeguard open space in our Local Plan. These principles continue to be relevant for the next strategy period and will underpin Local Plan policies.

Figure 2: Principles for Open Space

Protect	Protecting and safeguarding all existing open space such that there is no net loss.
Create	Maximising opportunities for new publicly accessible open space.
Enhance	Improving the quality, usability and accessibility of existing publicly accessible open spaces.
Connect	Creating new green corridors and enhancing existing ones to connect publicly accessible open spaces to main destination points.

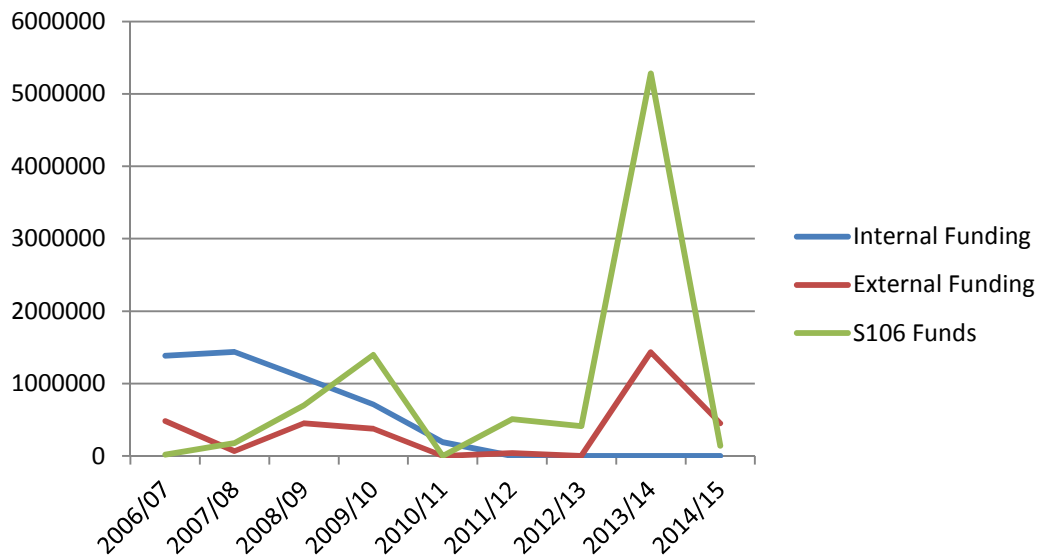
The evidence gathered as part of the Strategy development will inform and underpin planning policies in the emerging Local Plan related to developments which have implications for open space provision in the borough. Producing this strategy ensures consistency with national and regional guidance for the development of planning and open space policies.

[B] Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets

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The council will need to evidence the need for investment in parks and open spaces to feed into any review of the CIL Charging Schedule, ensure this need is reflected on the council's CIL Regulation 123 List, and secure S106 Planning Obligations where necessary. In the last strategy period, funding for parks and open spaces changed significantly. As the Government's austerity measures increased, council capital resource for open space reduced as available resource was increasingly focused to major capital projects to deliver transformational change. The Open Space strategy was instrumental in shaping local planning policy and helping to secure investment in parks and open spaces through Section 106 planning obligations (Tower Hamlets' Planning Obligations SPD, 2016). Between 2006 and 2015 £3.3 million was levered in from external sources. Approximately £8.6 million was secured via Section 106 funding.

Figure 3: Spending by funding streams for parks and open spaces, 2006/7 – 2014/15



Planning contributions are now one of the main sources of capital investment in the borough's parks. Since the adoption of the Tower Hamlets CIL in April 2015, future investment in existing publicly accessible open spaces will generally be met through CIL receipts. It will be increasingly important that the strategy helps secure contributions received from developers through the Infrastructure Delivery Framework by clearly demonstrating the demand on open space, and the priorities for investment. Access to new publicly accessible open space within developments will generally be secured through Section 106 legal agreements, with design, construction and maintenance being the responsibility of the developer.

[C] Contributing to sustainable development

The Strategy was also a key evidence base that functioned practically by informing development management policies and site allocations, through the Tower Hamlets Local Plan. This ensured that open space was given priority in

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new developments, such as in the St Andrews development. Going forward, the strategy will continue to be used by planners to guide their decision making when considering the need for open space in relation to specific sites.

[D] Addressing competing demands on parks and open spaces

As the population grows and changes, demand for existing open space will increase and competing demands on Tower Hamlets open spaces will need to be managed. Diversifying existing stock to meet different needs of different residents will be important; however it is unlikely that the borough will be able to fully meet the projected demand for open space, due to the density of the area.

Playing fields are one type of open space in Tower Hamlets. An external assessment of supply and demand data for playing fields has been drawn on in this strategy. Strategic actions to meet unmet demand for playing fields are deliberately considered in this overarching open space strategy, which considers all types of open space, to ensure demand for playing fields is balanced against demand for all types of open space.

[E] Mitigating the revenue costs for the council of providing parks and open spaces in Tower Hamlets

The Council needs to consider options for responding to the budget pressures that it will face over the next 5 years, in order to create financial security for Tower Hamlets Parks and open spaces. Meeting the costs of parks, particularly maintenance costs, in the context of rising demand and shrinking budgets, will be particularly challenging and options for managing these costs should be considered.

1.3. SUPPORTING CORPORATE PRIORITIES

Parks and open spaces help deliver the ambition to make Tower Hamlet's a *Great Place To Live*, which is part of the council's Community Plan and Strategic Plan. The priorities for delivering this ambition which are particularly relevant are:

Strategic Plan 2016 – 2018

Improving the local environment and public realm

Parks and open spaces are part of the local infrastructure, services and facilities in Tower Hamlets.

Developing stronger communities

Parks and open spaces play a role in bringing communities together by providing spaces and activities for different parts of the community to take part in.

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Community Plan 2015

Managing new development

The Open Space Strategy is a key evidence base document for the Local Plan in the areas of (i) development management policies and (ii) site allocations. It is used to inform the development of overarching principles which guide decision making, notably the commitment to protect, create and enhance open spaces.

Delivering key regeneration projects around the borough

At a site specific level, the Open Space Strategy influences site allocations through the Tower Hamlets Local Plan. The Open Space Strategy ensures through specific master-plans and supplementary planning documents that the provision and enhancement of publicly accessible open space is prioritised in all new development

Creating good quality community spaces and facilities

By mapping deficiency and auditing quality, the Open Space Strategy helps guide open space investment to where it is most needed.

Making Tower Hamlets 'greener'

Tower Hamlets has a Local Biodiversity Action Plan that sets out how to protect and enhance our important wild plants and animals and their habitats, and how to connect residents with nature. Our wildlife and natural habitats provide a range of environmental benefits. For example, vegetated spaces slow down runoff to help reduce flooding, and trees provide shade and can help reduce air pollution and noise, while bees and other insects are vital for pollinating crops in our food gardens.

Health and Wellbeing Strategy 2017

One of the five health and wellbeing priorities in the Health and Wellbeing Strategy is *Creating a healthier place*, part of the focus of this is improving existing open spaces to improve health outcomes.

Open and green spaces are important for promoting health and wellbeing. A recent Faculty of Public Health briefing paper¹ concluded on reviewing the evidence that contact with safe, green spaces can improve a number of aspects of mental and physical health and wellbeing as well as various social and environmental indicators.

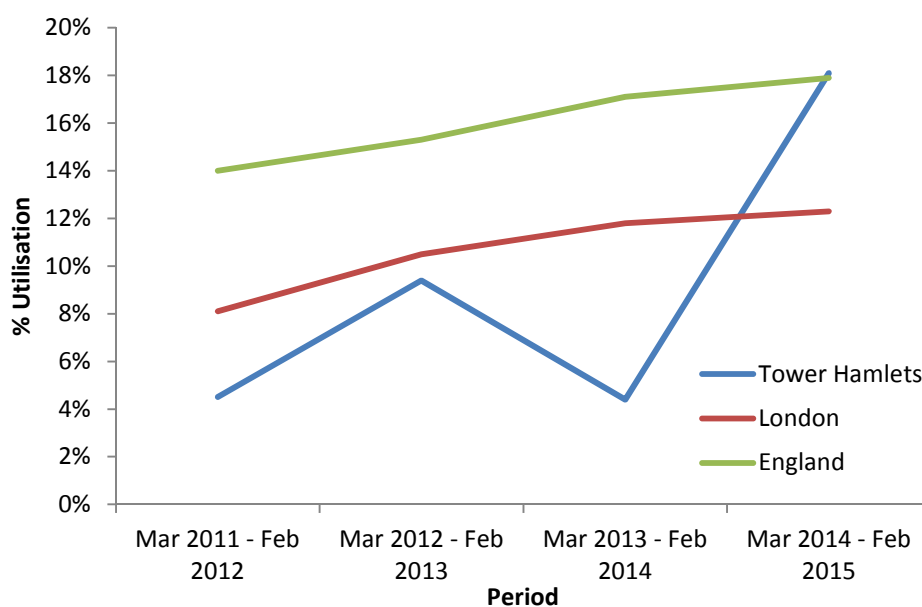
¹ Faculty of Public Health (2010) Great Outdoors: How Our Natural Health Service Uses Green Space To Improve Wellbeing, accessed 12 January 2017 [Online] http://www.fph.org.uk/uploads/bs_great_outdoors.pdf.

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- Contact with green spaces and natural environments can reduce symptoms of poor mental health and stress, and can improve mental wellbeing across all age groups.
- Access to green spaces can increase levels of physical activity for all ages.
- Having green spaces in an area can contribute to reduced health inequalities.
- Safe, green spaces can increase levels of communal activity across different social groups as well as increase residents' satisfaction with their local area.
- Green spaces can help with our response to climate change through their potential to reduce the impacts of heatwaves and reduce flooding and reducing CO2 emissions.
- Green spaces and natural environments can improve air and noise quality and support sustainability through increasing biodiversity, encouraging active transport and community participation.

As the figure below shows, the use of outdoor space for exercise and/or health reasons in Tower Hamlets increased during the period between March 2011 and February 2015. However, data show that there remain significant health gaps between the borough residents and the national average.

Figure 4: Utilisation of outdoor space for exercise/health reasons²



² Public Health Outcomes Framework (<http://www.phoutcomes.info/>)

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1.4. APPROACH TO DEVELOPING THE OPEN SPACE STRATEGY

The council have undertaken the following activities to devise this strategy:

- A desk top research and review, including performance and financial benchmarking, a best practice literature review, a review of existing consultation findings, and a strategic policy driver review.
- An externally commissioned, independent audit of all parks and open spaces in Tower Hamlets.
- In-house analysis of parks and open spaces, including mapping and modelling of open space requirements in the borough using projections taken from the Tower Hamlets Population growth model.
- A telephone consultation with a representative sample of residents to get their views of parks and open spaces in Tower Hamlets.
- In-depth focus groups with targeted stakeholder groups, including young people representatives.
- Workshops with internal stakeholders to establish strategic priorities.

1.5. SCOPE AND LIMITATIONS OF THE OPEN SPACE STRATEGY

Inter-related strategies

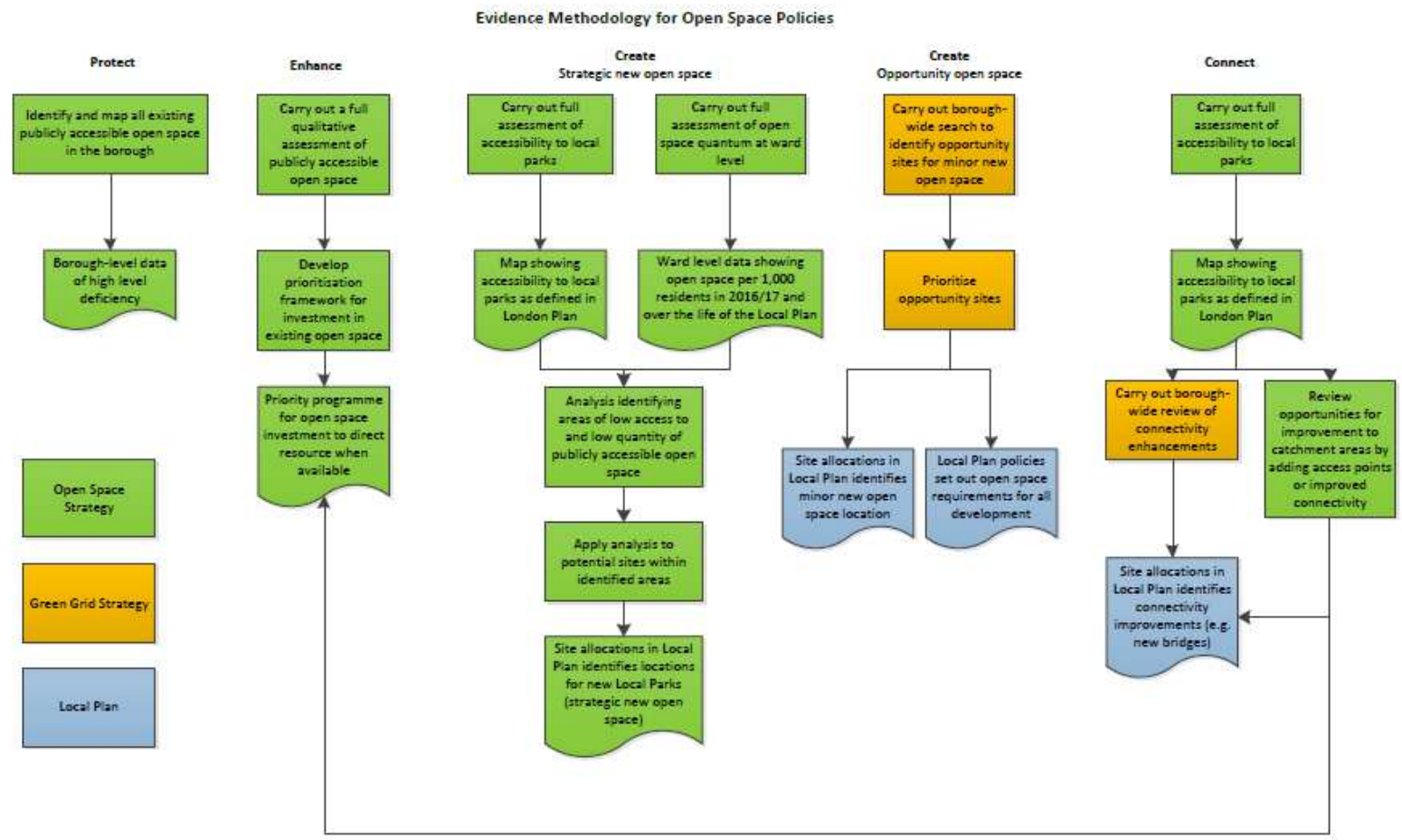
The Open Space Strategy is part of a number of sport and open space related strategy documents that are being developed in parallel and address separate but interrelated issues. This strategy focuses on ensuring that the network of open space and playing fields in the borough will be of sufficient quantity, quality, accessibility and suitability. It sits alongside:

- The Indoor Sports Facilities Strategy which focuses on ensuring that the network of indoor sports facilities in the borough will be of sufficient quantity, quality, accessibility and suitability.
- The Tower Hamlets Green Grid Strategy is an important part of managing open space infrastructure. The green grid approach has been developed in response to the borough's deficiency in open space, and seeks to improve access to existing open spaces and create a network of new, small open spaces and pocket parks. The green grid approach provides the guidance and objectives for improving connections between green spaces to create green corridors across the borough. It informs the justification and allocation of open space contributions to connectivity projects as identified through this particular approach. The diagram below seeks to clarify the relationship between and functions of the green grid approach, the Open Space Strategy and Local Plan policies.
- The Water Space Strategy, which focuses on the borough's canals, rivers and docks, ensuring that they are protected whilst being used to greatest effect for leisure, recreational and transport purposes where appropriate.
- The Physical Activity and Sport Strategy, which will be informed by the strategies mentioned above, will set out a vision for sports and physical

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activity in the borough including the outcomes that we want to improve on, including participation and sports development.

Figure 5: Open space evidence and strategy supporting the Local Plan



Limitations of the Open Space Strategy

It should be noted that the Open Space Strategy has a specific scope and therefore has the following limitations:

- It is not a day-to-day guide to service management and therefore it will not set out policies which are relevant to open space.
- It is not an investment programme and therefore will not set out specific investment projects for the next five to ten years. However, it is envisaged that it will act as a key decision making framework within which investment decisions are made.

The strategy focuses principally on questions of adequate provision and projected demand, and sets the strategic direction for community engagement in relation to improving and maintaining spaces. The strategy does not cover commercial events held in parks and open spaces.

CHAPTER 2: ASSESSMENT OF PARKS AND OPEN SPACES SUPPLY

2.1. CHAPTER OVERVIEW

The chapter sets out national and regional guidelines for open space assessments predominantly from the National Planning Policy Framework (NPPF), the Mayor's London Plan and Open Space Strategy guidance. It then details the approach Tower Hamlets has taken to devising an open space assessment, fit for the local context. The assessment in this chapter focuses on current supply and demand information for open spaces, the quality and value the existing open spaces offer, and projects likely supply and demand for open space in the next fifteen years. The assessment includes all forms of open space, but is particularly focused on publicly accessible open space. On the whole, it is publicly accessible open space which offers *all* residents recreational opportunities. The findings of this assessment will be used to inform local policies on open space. However the open space assessment is not a *definitive* guide to open space in planning policy terms. Planning policy is concerned with all open spaces and therefore has a broader remit than this assessment.

2.2. NATIONAL AND REGIONAL GUIDELINES

This section outlines national and regional guidelines for preparing an open space assessment, which informs the assessment.

This section covers the following:

- The National Policy and Planning Framework (NPPF) which sets out the need to assess the quality and quantity of open space.
- The Mayor's London Plan which outlines the need to assess all forms of open space, and to determine whether Londoners are within appropriate walking distances to open spaces.
- The Mayor of London's open space strategy best practice guidance which recommends that all open spaces are identified and categorised, and that an on-site audit of open space is carried out.
- Sport England's Playing Pitch Strategy Guidance.

The NPPF identifies that Planning Authorities like Tower Hamlets Council should make provision for open space. The NPPF sets out the importance of assessing the quality and quantity of open space to provide evidence for the Local Plan. The NPPF has now replaced the previous national Planning Policy Guidance (PPG), however the PPG notes provide a classification of open space by function which are still useful for open space assessments and are drawn on in the Open Space assessment, as discussed below.

The strategic concern of the Mayor's London Plan is the creation of open space, and the protection of the loss of open space through planning decisions. The London Plan provides guidance for the preparation of the Local Plan including the need to: include policies on protecting open space, identify areas of open space deficiency and plan to meet future open space needs. The guidance requires that local authorities carry out assessments of all forms of open space. The London Plan also focuses on measuring open space provision (and deficiency) by assessing whether people live within the catchment area of open spaces of particular sizes. It provides a classification system for open spaces by size and provides ideal walking distances to those spaces.

The Mayor of London's best practice guidance on producing an open space strategy sets out the need for local authorities to understand the supply and demand of open space and identify open space deficiencies in order to secure new provision and improve existing provision. To understand supply the guidance recommends that local authorities identify all open spaces, categorise all open space by function and size and carry out an on-site audit of open space. It recommends that PPG guidance is followed when looking at the function of open spaces and London Plan is followed when looking at size. Local demand should be established by looking at demographic data and on the basis of local consultation. This chapter will consider demand by looking at population growth. A separate chapter on consultation is being prepared to address local demand in full.

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Sport England's Playing Pitch Strategy Guidance assists local authorities to plan positively for the provision of outdoor play pitches, an important type of open space. The guidance sets out a step by step approach to developing and delivering playing pitch strategies that cover both grass and artificial provision. The guidance was developed in partnership with the national governing bodies of football, cricket, rugby and hockey. Sport England recommends that local authorities research and evaluate the overall supply of playing pitches, and the overall demand for those facilities that is both realised and latent. Further to this evidence, the guidance recommends local authorities gather the views of local clubs and other facility users in order to inform the quantitative and qualitative analysis. The guidance and its appendices also provide detailed recommendations on best practice for assessing the quality of playing pitches, and the extent to which they are fit for purpose for the sporting disciplines that they serve.

2.3. OPEN SPACE DEFINITIONS, CLASSIFICATIONS AND MEASUREMENTS

This section describes the definitions, classifications and measurements used in the assessment, which ensures the strategy meets national and regional guidelines and is appropriate for the local context. It covers:

- A broad definition of open space, used to identify all forms of open spaces, as required by the London Plan, which excludes water space.
- A definition of water space, as required by the London Plan.
- A second definition of open space, to identify publicly accessible open spaces, which form the basis of a quantity and quality assessment.
- The statutory definition of playing fields for the playing pitch element of this strategy.
- Fields in Trust quantity guidelines which have been used to devise a local open space standard to measure open space provision.
- A classification of open spaces by function using the classification set out in the PPG and a classification of open spaces by size using a local typology based on the London Plan hierarchy. Both open space and publicly accessible open space are classified using these typologies.
- London Plan guidelines used to establish catchment areas for parks and identify parts of the borough where residents cannot access open spaces in line with London Plan guidance.

Definition of open space (general)

For the purposes of the Local Plan, open space means *“all land that offers opportunity for play, recreation and sport or is of amenity value, whether in public or private ownership and where public access is unrestricted, partially-restricted or restricted. This includes all open areas consisting of major parks, local parks, gardens, squares, playgrounds, ecological spaces, housing amenity land, playing fields (including playing pitches), allotments and burial grounds, whether or not they are accessible to the public. This definition does not include water bodies.”*

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The Local Plan definition includes spaces whether they are privately or publicly owned, accessible to the public or not with the following exceptions:

- Private residential gardens
- Incidental areas such as shrub beds and verges.

This definition is used when assessing open space. Where an adapted version of this definition is used in the assessment, this is detailed in the methodology sections.

Definition of water space

For the purposes of the Local Plan water space means *“an area of water (permanently or intermittently), and the adjacent land, and includes rivers, canals, docks, basins, ponds and marshland and other water bodies.”*

Definition of publicly accessible open space

The Tower Hamlets Local Plan defines publicly accessible open space as follows: *“Open space will be considered to be publicly accessible, where access for the public is secured by virtue of legal agreements and formal arrangement; whether it is in public or private ownership. Publicly accessible open space will not include areas of water such as rivers, canals, lakes, docks or incidental spaces.”*

In contrast to the broader definition of open space, publicly accessible open space only includes open spaces whether they are privately or publicly owned, as long as they are partially or fully accessible to the public.

Therefore, in addition to the exceptions listed in the definition of open spaces, the following types of open space are also excluded:

- Privately owned closed grounds
- Most housing amenity areas. Housing amenity land is mostly excluded because it is not accessible to the wider public. Only housing amenity land which is publicly accessible by virtue of its design and appearance is included.

This definition is used when assessing publicly accessible open space. Where an adapted version of this definition has been used in the assessment, this is detailed in the methodology sections.

Definition of playing fields and playing pitches

Statute and Sport England guidance define playing fields and playing pitches as follows:

Playing pitch – a delineated area which, together with any run off area, is of 0.2 hectares or more, and which is used for association football, American

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football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo.

Playing field – the whole of a site which encompasses at least one playing pitch. Sport England's policy is to protect all parts of a playing field, not just those which happen, for the time being, to be laid out as pitches. This is because those other parts of a playing field are a resource which may be needed, now or in the future, and it is important that they be afforded the same protection.

Open Space Standard

Publicly accessible space is assessed against the Open Space Standard devised from the Fields in Trust quantity guidelines for the provision of formal and informal outdoor space. Fields in Trust recommend standards for the amount of open space that should be provided, according to the type of open space.

The Fields in Trust guidance recommends the guidelines are adjusted to take account of local circumstances. The current local open space standard is 1.2 hectares (ha) per 1,000 residents and was initially set in 2005, as part of the development of the first Open Space Strategy. The standard was derived from the existing amount of publicly accessible open space in the borough at the time (2005) and the total resident population. The quantitative assessment of publicly accessible open space and the methodology has remained constant since the first assessment was undertaken in 2005, enabling the Council to monitor open space provision over time.

The local standard is a composite standard that takes into account all types of publicly accessible open space, including publicly accessible play space and space for outdoor sports. This approach reflects the constraints in an inner city high density borough in which all open space needs must be considered in conjunction rather than using separate standards. As set out elsewhere in this document, given the high density and population growth locally, spaces will need to perform a multitude of functions and can not necessarily be delineated in the same way as may be more appropriate for rural or suburban areas.

The Open Space Standard contains provision for play in publicly accessible open space. However, it does not set a play standard for the borough as a whole. While play takes place in publicly accessible spaces, much happens on housing amenity land or other spaces which are not open to the general public.

The Field in Trust guidance recommends the guidelines are adjusted to take account of local circumstances. The current local open space standard is 1.2 hectares (ha) per 1,000 residents and was initially set in 2005, as part of the development of the first Open Space Strategy. The standard was derived from the existing amount of publicly accessible open space in the borough at the

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time (2005) and the total resident population. The quantitative assessment of publicly accessible open space and the methodology has remained constant since the first assessment was undertaken in 2005, enabling the Council to monitor open space provision over time.

Classification of open spaces by function (formerly PPG 17)

The former Planning Policy Guidance (PPG) 17 provides a useful approach to categorising open spaces, based on the primary function of a space. Tower Hamlets use this classification when providing a breakdown of the borough's open spaces. This means the borough's open spaces data is compatible with national data collection and monitoring.

Figure 6: Open Space classification by function, PPG 17 typology

PPG17 Typology	Primary purpose
Parks and gardens	Accessible, high quality opportunities for informal recreation and community events.
Natural and semi-natural green spaces	Wildlife conservation, biodiversity and environmental education and awareness.
Green corridors	Walking, cycling or horse riding, whether for leisure purposes or travel, and opportunities for wildlife migration.
Outdoor sports facilities	Participation in outdoor sports, such as pitch sports, tennis, bowls, athletics or countryside and water sports.
Amenity green spaces	Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas.
Provision for children and young people	Areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, ball courts, skateboard areas and teenage shelters.
Allotments, community gardens and urban farms	Opportunities for those people who wish to do so to grow their own produce as part of the long term promotion of sustainability, health and social inclusion.
Churchyards and cemeteries	Quiet contemplation and burial of the dead, often linked to the promotion of wildlife conservation and biodiversity.
Civic spaces	Providing a setting for civic buildings, public demonstrations and community events.

Classification of open spaces by size and ideal walking times (London Plan hierarchy and local hierarchy)

The London Plan hierarchy classifies open space by size, as set out in Figure 7 below. As noted in the Mayor of London's open space strategy guidance, in dense urban areas like Tower Hamlets small sites play a vital role in providing access to open spaces. With this in mind, Tower Hamlets has subdivided the small open spaces category to distinguish between small open spaces that are below 1 ha and small open spaces that are above 1 ha. Small open spaces above 1ha are roughly the size of a football pitch and are known as Tower Hamlets local parks. Those below 1ha continue to be known as small open spaces.

The London Plan hierarchy sets out ideal walking distances to open spaces for Londoners. These guidelines can be used to assess whether parts of the borough are not within ideal walking times to open spaces. Tower Hamlets has also set ideal walking times to Tower Hamlets local parks.

Figure 7: Open space classification by size and expected walking distances: local hierarchy based on the London Plan

Open space classification	Size Guideline	Distances from home
<p>Regional parks</p> <p>Large areas, corridors or networks of open space, the majority of which will be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. Offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.</p>	Over 400 ha	3.2 to 8 km
<p>Metropolitan parks</p> <p>Large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level, are readily accessible by public transport and are managed to meet best practice quality standards.</p>	60 to 400 ha	3.2 km
<p>District/major parks</p> <p>Large areas of open space that provide a landscape setting with a variety of natural features providing a wide range of activities, including outdoor sports facilities and playing fields, children’s play for different age groups and informal recreation pursuits.</p>	20 to 60 ha	1.2 km
<p>Local parks and open spaces</p> <p>Providing for court games, children’s play, sitting out areas and nature conservation areas.</p>	2 to 20 ha	400m
<p>Tower Hamlets local park</p> <p>Similar to the small open spaces classification and in addition provides for active recreation. <i>NB: In the original London Plan hierarchy this category is part of the small open spaces category.</i></p>	1 to 2 ha	400m
<p>Small open spaces</p> <p>Gardens, sitting out areas, children’s play spaces or other areas of a specialist nature, including nature conservation areas. <i>NB: In the original London Plan hierarchy this category includes open spaces between 0.4 ha to 2 ha.</i></p>	0.4 to 1 ha	Less than 400m
<p>Pocket parks</p> <p>Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating</p>	Under 0.4 ha	Less than 400m

Open space classification	Size Guideline	Distances from home
and play equipment.		
Linear open spaces Open spaces and towpaths alongside the Thames, canals and other waterways; paths, disused railways; nature conservation areas; and other routes that provide opportunities for informal recreation. Often characterised by features or attractive areas which are not fully accessible to the public but contribute to the enjoyment of the space.	Variable	Wherever feasible

2.4. THE ASSESSMENT

The open space assessment provides the supply analysis of open space in Tower Hamlets and includes some information on demand. The assessment has been organised into four distinct parts with each one assessing a particular aspect of open space provision (and deficiency). A methodology and key findings are provided for each part.

- **Part A is a desktop audit of all open spaces in Tower Hamlets.** This part of the assessment is a comprehensive audit of all open spaces in Tower Hamlets, which is in line with London Plan guidance. It includes new sites which have come forward since the last strategy was prepared.
- **Part B is a quantitative assessment of publicly accessible open spaces.** This part of the assessment identifies the sites in the borough which are publicly accessible and assesses the overall provision of publicly accessible open space against the local open space standard. It is used to identify whether there is a deficiency of publicly accessible open space.
- **Part C maps catchment areas for open spaces in Tower Hamlets.** This part of the assessment identifies the parts of the borough that are within walking distance to parks by drawing catchment areas for parks, based on London Plan guidance. It helps to identify parts of the borough outside of catchment areas, therefore providing further insight into open space deficiency in the borough.
- **Part D is an external assessment of the quality and value of open space sites in Tower Hamlets.** This part of the assessment includes a quality and value assessment, predominantly of publicly accessible open space.

- **Part E is an external assessment of playing pitches in Tower Hamlets.** This part of the assessment looks specifically at playing pitches, as a type of open space.

PART A: DESKTOP AUDIT OF OPEN SPACE

2.5. METHODOLOGY

A desktop audit has been carried out to identify *open spaces* in the borough, in line with the London Plan definition of open space, set out on page 3, with the following exception: the audit has predominantly focused on publicly accessible housing amenity land because identifying all housing amenity land would be extremely time consuming. The list of housing amenity land included in this audit is therefore not an exhaustive one.

The audit also includes some out of borough spaces that are within a 5 minute walk of the borough boundary, because they provide accessible open spaces to borough residents.

New open spaces delivered in the borough have been identified by thoroughly reviewing the council's planning agreements and other records to identify proposed spaces which have been delivered. Spaces have been identified, reviewed and verified, then plotted on the council's GIS system and then categorised according to their primary function and size.

2.6. FINDINGS

- The Distribution of Open Spaces Map [Map 2] shows all the borough's open space which have been audited.
- 212 open spaces were identified in the audit (both publicly accessible and inaccessible), listed in table 2.3 in the Appendix.
- Maps 3 to 7 show the open spaces in Tower Hamlets and their primary function, according to the former PPG17 typology.
- Figure 8 below provides a breakdown of the 212 open spaces, according to their primary function. It also identifies whether the spaces are owned by Tower Hamlets.

Figure 8: Open spaces by function

Open Space by function (Former PPG17 typology)*³	LBTH owned	Not LBTH owned	Total
Allotments, community gardens and city (urban farms)	1	5	6
Amenity green space	2	21	23
Cemeteries and churchyards	12	8	20
Civic spaces	3	20	23
Green corridors	9	3	12
Natural and semi natural urban green spaces	1	1	2
Outdoor sports facilities	0	7	7
Parks and gardens	82	25	107
Provision for children and teenagers	5	7	12
Total	115	97	212

- Figure 9 below provides a breakdown of the 212 open spaces in Tower Hamlets, according to their size. It also identifies whether the spaces are owned by Tower Hamlets.

³ Sites are categorised by their primary function only. The figures for certain sites, may therefore seem lower than expected. For example, Mudchute Farm is part of the Milwall Park site and has been counted as part of the parks and open spaces category only. It does not appear in the allotments, community gardens and city (urban farms) category, so the number of sites in this category may seem lower than expected.

Figure 9: Open spaces by size

Open Space by size (Local hierarchy based on the London Plan)	LBTH owned	Not LBTH owned	Total
District park	2	0	2
Linear open space	11	19	30
Local park and open space	8	2	10
Metropolitan park	1	0	1
Pocket park	47	50	97
Small open space	31	20	51
Tower Hamlets local park	15	6	21
Total	115	97	212

PART B: QUANTITATIVE ASSESSMENT OF THE SUPPLY OF PUBLICLY ACCESSIBLE OPEN SPACE

2.7. METHODOLOGY

A list of publicly accessible open space in Tower Hamlets has been put together, in line with the definition of publicly accessible open space. The list of publicly accessible open spaces has been sorted to identify their function in line with PPG and size, in line with the local hierarchy.

The total provision of publicly accessible open space has then been calculated by adding up the area of the open spaces in hectares. For the purposes of the open space standard, only publicly accessible open space is included.

2.8. FINDINGS

Current supply of open space

- The provision of publicly accessible open space in Tower Hamlets in 2016/17 is 260.58 ha compared to just under 248ha in 2011. However, it should be noted that while some of this increase has been achieved through new publicly accessible space within development, part of the increase is due to refined methodology. Map 9 identifies the publicly accessible open space in Tower Hamlets.
- As at 2016/17, there was a total of 0.89 ha per 1,000 residents in Tower Hamlets. This is less than the local open space standard of 1.2 ha per 1000 residents.
- A list of all publicly accessible open spaces is provided in table 2.4 in the Appendix. Figure 10 below provides a breakdown of the 172 publicly accessible open spaces identified in the assessment, according to their function. It also identifies the number of sites owned by Tower Hamlets.

Figure 10: Publicly accessible open spaces by function

Publicly accessible open space by function (Former PPG17 typology)	LBTH owned	Not LBTH owned	Total
Allotments, community gardens and city (urban farms)	1	4	5
Amenity green space	2	16	18
Cemeteries and churchyards	12	3	15
Civic spaces	1	8	9
Green corridors	0	1	1
Natural and semi natural urban green spaces	1	1	2
Parks and gardens	82	21	103
Provision for children and teenagers	5	7	12
Grand Total	104	68	172

- Figure 11 below provides a breakdown of the 172 publicly accessible open spaces in Tower Hamlets according to their size, using the London Plan hierarchy with the addition of the Tower Hamlets local park category. It also identifies which are owned and maintained by the council.

Figure 11: Publicly accessible open space by size

Publicly accessible open space (Local hierarchy based on the London Plan)	LBTH owned	Not LBTH owned	Total
District park	2	0	2
Linear open space	0	1	1
Local park and open space	8	1	9
Metropolitan park	1	0	1
Pocket park	47	43	90
Small open space	31	18	49
Tower Hamlets local park	15	5	20
Total	104	68	172

PART C: CATCHMENT AREAS FOR OPEN SPACES IN TOWER HAMLETS

2.9. METHODOLOGY

London Plan guidelines on ideal walking times to open spaces of particular sizes have been used to establish 'catchment areas' for parks above 1ha, parks above 2ha and parks above 20ha in Tower Hamlets.

Catchment areas were mapped in line with London Plan guidelines as follows:

- For parks above 1 ha a catchment area was established by plotting 400 metres or 5 minutes walking distance from each park.
- For parks above 2 ha a catchment area was established by plotting 400 metres or 5 minutes walking distance from each park.
- For parks above 20 ha a catchment area was established by plotting 1.2 kilometre or 15 minutes walking distance from each park.

Parks were mapped in house using GIS software and Ordnance Survey data. Parks were only included if they were publicly accessible. The maps also included parks near to the boroughs boundary in recognition that residents may walk to parks outside of Tower Hamlets. Those within 1.2km of the borough boundary were included, in line with London Plan guidelines.

For each size of park, a map has been created showing catchment areas for 2016 and a separate map showing catchment areas for 2030. The key difference is that the 2030 maps include planned foot bridges, because they can impact on the walking routes pedestrians can take which can change the catchment area of a park.

Catchment areas are shaded pink. Areas outside of the catchment areas (i.e. those not shaded pink) do not have parks within an appropriate walking distance, according to the London Plan.

2.10. FINDINGS

Access to parks 1 ha and above (Tower Hamlets Local Parks)

- Map 10 shows the parts of the borough within the catchment areas of a park above 1 ha, and those outside the catchment area of a park above 1 ha.
- Below are some of the areas of the borough that are within the catchment area of a park above 1 ha:
 - In the western part of the borough, areas such as Wapping, Shadwell and central Bethnal Green.

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- Areas in the central part of the borough such as Stepney Green and Mile End and in the north near Victoria Park.
- In the eastern part of the borough, Poplar.
- In the southern part of the borough, Island Gardens and Milwall.
- Below are some of the areas of the borough outside the catchment area of a park above 1 ha:
 - In the western part of the borough: Whitechapel, Shoreditch, Spitalfields and the northern Bethnal Green area.
 - In the eastern part of the borough, the eastern edge including Bromley by Bow and Blackwall.
 - In the southern part of the borough, the area to the south of Canary Wharf.
- Map 17 shows how catchment areas for existing parks above 1 ha will improve as a result of planned bridges across the borough. The changes are minimal as bridges are mainly proposed along the eastern boundary of the borough, where there is a lack of open space in general and as consequence the impact of bridges is limited.

Access to parks 2 ha and above (Local Parks)

- Map 11 shows the parts of the borough within the catchment area of a park above 2ha, and those outside the catchment area of a park above 2 ha.
- Below are some of the areas within the catchment area of a park above 2ha:
 - In the western part of the borough, the central Bethnal Green area.
 - Areas along the central part of the borough, including Mile End, and in the north near Victoria Park.
 - In the south, the eastern corner of the Isle of Dogs.
- Below are some of the areas outside the catchment area of a park above 2 ha:
 - The western edge of the borough from north to south including Wapping, Whitechapel, Shoreditch, Spitalfields and part of Bethnal Green.
 - The eastern edge of the borough.
 - In the south, Limehouse and the north and south west of the Isle of Dogs.
- Map 18 shows how catchment areas for existing parks above 2 ha will improve as a result of planned bridges across the borough. The changes are minimal as bridges are mainly proposed along the eastern boundary of the borough, where there is a lack of open space in general and as consequence the impact of bridges is limited.

Access to parks above 20 ha (major parks)

- Map 12 shows the parts of the borough that are within the catchment area of a park above 20ha:
- Below are some of the areas of the borough within the catchment area of a park above 20ha:
 - Areas along the central spine of the borough, particularly the north near Victoria Park.
 - In the south, to the south of the Isle of Dogs.
- Below are some of the areas of the borough outside the catchment area of a park above 20ha:
 - The western quarter of the borough, comprising of areas such as Whitechapel, Shadwell, Wapping, Shoreditch, Spitalfields, northern and western Bethnal Green.
 - A large section in the eastern area around Poplar, Leamouth Peninsula, Aberfeldy, Canary Wharf and west of the Isle of Dogs.
- Map 19 shows how catchment areas for existing parks above 20 ha will improve as a result of planned bridges across the borough. There is only one park in this group in the hierarchy to which access will improve as a result of additional bridges. Residents in Bow will have improved access to the Queen Elizabeth Olympic Park.

PART D: EXTERNAL ASSESSMENT OF QUALITY AND VALUE

2.11. METHODOLOGY

An external assessment was carried out on sites above 0.2 hectares. Generally, the open space sites that have been assessed for quality and value are publicly accessible open spaces. However, the total number of open spaces assessed for quality and value differs to the number of publicly accessible open spaces identified in the quantitative assessment. This is because:

- There are sites in Tower Hamlets which are not currently publicly accessible, but are expected to become publicly accessible in the future. Some sites of this nature were included in the assessment.
- The contractors were unable to gain access to some sites to carry out an assessment. They were not included in the assessment. For example, outdoor facilities located at schools.
- Finally, for the purposes of carrying out a robust quality and value assessment, the contractors assessed Milwall and Mile End Park in sections which impacts on the total number of sites they recorded in their assessment.

Individual spaces were assessed on eight overarching themes devised from Green Flag criteria (see table 8 below). Against each theme individual spaces were given a score against 'quality' and 'value' criteria. The quality and value criteria used varied according to the type of open space. The Green Flag criteria set a very high benchmark for assessment of open spaces. Sites below this standard may still be of good quality and value but fall short of the "gold standard" set for being awarded a Green Flag.

The scores for quality and value were compared against benchmark standards set for quality and value. Broadly speaking, quality is a measure of the condition of sites and value assesses what is on offer at each site e.g. facilities. Each space was awarded a plus or a minus for quality, depending on whether the space scored above (+) or below (-) the benchmark standard. Each space was also awarded a plus or minus for value, depending on whether the space scored above (+) or below the standard. Benchmarks were set by looking at high quality and high value sites and were designed to be aspirational, yet achievable.

Figure 12: Green Flag criteria: quality and value assessment

<u>Green Flag Theme</u>
A welcoming place: Welcoming, good and safe access, signage, equal access for all
Healthy, safe and secure: Safe equipment and facilities, personal security, dog fouling, appropriate provision of facilities, quality of facilities
Clean and well maintained: Litter and waste management, grounds maintenance and horticulture, building and infrastructure maintenance, equipment maintenance
Sustainability: Environmental sustainability, pesticides, peat use, waste minimisation, arboriculture and woodland management
Conservation and heritage: Conservation of nature features, wild flora and fauna, conservation of landscape features, conservation of buildings and structures
Community involvement: Community involvement in management and development including outreach work, appropriate provision for the community
Marketing: Marketing and promotion, provision of appropriate information, provision of appropriate educational interpretation/information
Management: Implementation of management plan

It should be noted that a comparison cannot be made between the external assessment carried out in 2011 as part of the open space strategy, and the external assessment carried out in 2016. The 2016 audit uses distinct criteria for assessing different types of open space for quality and value. In 2011 all open spaces were assessed using the same criteria for quality and value, regardless of their type. The 2016 approach accounts for the fact that it might be inappropriate to assess whether a range of activities are on offer at a nature reserve as part of assessment of value, but this approach could work for a non-specialist park. The approach taken in 2016 therefore offers a more sophisticated understanding of our parks and open spaces.

192 open spaces in Tower Hamlets were externally assessed to establish the quality and value of each site. Table 2.5 in the Appendix provides a full list of sites that were assessed for their quality and value, and their scores.

2.12. FINDINGS

Quality

- 80 parks and open spaces in Tower Hamlets scored above the quality standard, of which 47 are owned by Tower Hamlets, 33 are not owned by Tower Hamlets.

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- 112 parks and open spaces in Tower Hamlets scored below the quality standard, of which 73 are owned by Tower Hamlets; 39 are not owned by Tower Hamlets.
- Map 14 identifies parks above and below the quality threshold with their respective catchment areas.
- The table below identifies the sites that scored above the quality standard and below the quality standard, grouped by their function with their owner identified. Of those spaces which were assessed:
 - Most amenity green spaces were not owned by Tower Hamlets, and the majority (13) were considered below standard, with 9 above standard.
 - A high proportion of cemeteries and churchyards were considered below standard (13 out of 18).
 - Most of the civic spaces were not owned by Tower Hamlets, and 7 were above standard and 9 were below standard. .
 - The majority of open spaces were classified as parks and gardens, and the split between those above standard and below standard was roughly 2:3.

Figure 13: Parks and open spaces which are above quality standard (+) and below standard (-), by function

	+	+	+ Total	-	-	- Total	Grand Total
	LBTH owned	Not LBTH owned		LBTH owned	Not LBTH owned		
Allotments, community gardens and city (urban farms)	2	2	4	0	3	3	7
Amenity green space	1	8	9	1	12	13	22
Cemeteries and churchyards	4	1	5	8	5	13	18
Civic spaces	0	7	7	3	6	9	16
Green corridors	5	1	6	4	1	5	11
Natural and semi natural urban green spaces	1	1	2	0	0	0	2
Parks and gardens	32	9	41	54	11	65	106
Provision for children and teenagers	2	4	6	3	1	4	10
Grand Total	47	33	80	73	39	112	192

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- The table below identifies the sites that scored above the quality standard and below the quality standard, grouped by their size with their owner identified.
 - The majority of local parks (7 out of 10) were above standard.
 - The most common size of park and open spaces which were externally assessed were pocket parks. The majority (53 out of 91) were found to be below standard.
 - Just under half of Tower Hamlets Local Parks were above standard (9 out of 19).

Figure 14: Parks and open spaces which are above quality standard (+) and below standard (-) by size

	+		+ Total	-		- Total	Grand Total
	LBTH	Not LBTH owned		LBTH	Not LBTH owned		
District park	2	0	2	5	0	5	7
Linear open space	5	3	8	6	7	13	21
Local park and open space	5	2	7	3	0	3	10
Metropolitan park	1	0	1	0	0	0	1
Pocket park	17	21	38	30	23	53	91
Small open space	10	5	15	21	7	28	43
Tower Hamlets local park	7	2	9	8	2	10	19
Grand Total	47	33	80	73	39	112	192

Value

- 99 parks and open spaces in Tower Hamlets scored above the value standard, of which 55 are owned by Tower Hamlets, 44 are not owned by Tower Hamlets.
- Map 15 identifies parks above and below the value threshold with their respective catchment areas.
- The table below identifies the sites that scored above and below the value standard, grouped by their function with their owner identified:
 - The majority of amenity green spaces that were assessed were not LBTH owned, and scored above the value standard.
 - The majority of cemeteries and churchyards are LBTH owned and scored above standard for value.
 - Around two thirds of parks and open spaces score below standard.

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Figure 15: Parks and open spaces which are above value standard (+) and below value standard (-) by function

	+		+ Total	-		- Total	Grand Total
	LBTH	Not LBTH owned		LBTH	Not LBTH owned		
Allotments, community gardens and city (urban farms)	2	2	4	0	3	3	7
Amenity green space	2	15	17	0	5	5	22
Cemeteries and churchyards	11	3	14	1	3	4	18
Civic spaces	2	13	15	1	0	1	16
Green corridors	6	2	8	3	0	3	11
Natural and semi natural urban green spaces	1	1	2	0	0	0	2
Parks and gardens	30	6	36	56	14	70	106
Provision for children and teenagers	1	2	3	4	3	7	10
Grand Total	55	44	99	65	28	93	192

- The table below identifies the sites that scored above the value standard and below the value standard, grouped by their size with their owner identified.
 - The majority of local parks score above the value standard.
 - Most pocket parks are not owned by LBTH. The majority of pocket parks scored below standard for value.
 - There is roughly an even split between Tower Hamlets local parks which scored above standard and below standard.

Figure 16: Parks and open spaces which are above value standard (+) and below value standard (-) by size

	+		+ Total	-		- Total	Grand Total
	LBTH	Not LBTH owned		LBTH	Not LBTH owned		
District park	4	0	4	3	0	3	7
Linear open space	7	8	15	4	2	6	21
Local park and open space	8	2	10	0	0	0	10
Metropolitan park	1	0	1	0	0	0	1
Pocket park	10	26	36	37	18	55	91
Small open space	16	6	22	15	6	21	43
Tower Hamlets local park	9	2	11	6	2	8	19
Grand Total	55	44	99	65	28	93	192

PART E: EXTERNAL ASSESSMENT OF PLAYING PITCHES AND OUTDOOR SPORT FACILITIES

2.13. METHODOLOGY

The Open Space Strategy brings together considerations for open space more generally and outdoor sports facilities specifically in one strategic document. Bringing these aspects together allows different demands on limited open space to be balanced more effectively in a high density borough.

The Strategy is supported by an external assessment of the quality, supply and demand of outdoor playing pitches and sports facilities. The assessment has been carried out in partnership with Sport England and relevant sports governing bodies. It follows the principles of stages A to C of Sport England's guidance for the development of playing pitch strategies. These stages relate to the needs assessment only and specifically cover:

- Stage A: prepare and tailor the approach;
- Stage B: Gather information and views on the supply of and demand for provision;
- Stage C: Assess the supply and demand information and views.

Findings, recommendations and actions relating to outdoor sports facilities contained in the Open Space Strategy follow the principles of Stage D of Sport England's guidance (development of the strategy and action plan). This approach is supported by the NPPF and associated guidance which states that planning authorities may refer to Sport England's guidance.

The Strategy covers the following outdoor sports facilities (pitch and non-pitch):

- Football
- Cricket
- Rugby union
- Artificial grass pitches (AGP) including use for hockey and third generation (3G) pitches
- Tennis
- Bowls
- Athletics

Tower Hamlets has been split into four distinct areas for the purpose of assessment, aligning to the four sub-areas applied within the Local Plan. Referred to as analysis areas, they are (including current population):

- City Fringe
- Isle of Dogs

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- Lower Lea Valley
- Rest of Borough

The assessment considers three main aspects of the current supply, namely quantity, accessibility and quality. The findings of the current supply assessment are then used, in conjunction with demand information, to determine the extent to which current supply meets demand.

Quantity

All outdoor pitches and sports facilities are included irrespective of ownership, management and use. Sites were initially identified using Sport England's Active Places web based database and verified using data held by the council and national sports governing bodies.

It is likely there is a level of imported demand and sports teams from outside the study area that use facilities within Tower Hamlets. In addition, it is likely that sports teams from inside Tower Hamlets use facilities outside of the borough. This cross-boundary movement has been taken into consideration when producing the assessment, together with any areas close to the borough boundary within 1km where significant sports facilities are present and import/export participation is occurring on a regular basis. The assessment counts individual pitches (as a delineated area) as the basic unit of supply.

Accessibility

Not all facilities offer the same level of access to the community. The ownership and accessibility of sports facilities also influences their actual availability for community use. Each site is assigned a level of community access as follows:

- Available for community use and used
- Secured community use
- Available but unused
- No community use
- Disused
- Lapsed

Quality

The capacity for pitches and outdoor sports facilities to regularly provide for competitive play, training and other activity over a season is most often determined by their quality.

It is not just the quality of the surface itself which has an effect on its capacity but also the quality, standard and range of ancillary facilities. The quality of both the surface and ancillary facilities will determine whether a pitch or facility is able to contribute to meeting demand from various groups and for different levels and types of play.

The quality of all pitches and facilities has been assessed based on recommended criteria for different facility types. Along with capturing any details specific to the individual pitches and facilities, a quality rating is recorded within the audit for each pitch or facility. The ratings are used to help estimate the capacity of each pitch to accommodate competitive and other play within the supply and demand assessment.

In addition to undertaking non-technical assessments, users and providers were also consulted with regard to quality.

2.14. FINDINGS

Key Findings

- The majority of sports pitches and outdoor sports facilities in Tower Hamlets are located in publicly accessible open spaces and cater for matches, training, informal play, and wider use as open space when they are not in sport use. The accessible location of many facilities and their variety of uses as open spaces creates particular challenges when maintaining the quality of playing surfaces.
- Public open space sites that are of the right dimensions to accommodate formal playing pitches or courts whilst retaining space for other open space functions and/or retaining their heritage or biodiversity value already provide at least one pitch.
- There are 22 grass football pitches in adult and youth sizes in the borough. This current supply of football pitches is insufficient to accommodate existing demand for adult and youth football. Pitches are used more intensely than recommended by the Football Association in order to address demand.
- There are 32 third generation artificial grass pitches in the borough, of which one is full sized and FIFA certified, making it suitable for competitive football. The Football Association's training model indicates that the supply of one full sized pitch is insufficient to meet demand.
- There are four non-turf and no natural turf cricket pitches in the borough. This current supply of cricket pitches is insufficient to accommodate existing demand. Pitches are used more intensely than recommended by the England Cricket Board in order to address demand.
- There is only one rugby union pitch in the borough which is insufficient to meet demand. The pitch is subject to more use than recommended by the Rugby Football Union.
- There are three hockey suitable artificial turf pitches in the borough. This current supply is insufficient to meet existing demand from clubs based within the borough.
- Tennis court capacity is sufficient. There are 24 courts currently available for community use.
- There are three bowling greens in Tower Hamlets, which provide more capacity than is currently required. Club numbers at all sites indicate

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that there is spare capacity. At one site the membership is particularly low, indicating that the site may not be sustainable.

- There is one athletics track and field in Tower Hamlets and this is considered sufficient to meet demand.

Football

There are a total of 22 grass football pitches across eight sites in Tower Hamlets, of which all are reported to be available for community use on some level. Seven of the sites are public parks and one is within the boundaries of Mile End Park Leisure Centre. The grass pitch at Mile End Park Leisure Centre also serves as the athletics field. There are no dedicated sites, such as sites owned and managed by clubs. It should be noted that the grass football pitch at Stepney Green Park is only marked during the summer and therefore is unavailable during the traditional winter football season during which the data to inform this section was captured. Although some pitches may not have official recorded training or match use they may serve a wider purpose within the community as public open space.

Figure 17: Grass football pitches by location and size

Analysis Area	Pitch type					Total
	Adult	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5	
City Fringe	2	-	1	-	-	3
Isle of Dogs	2	3	1	-	2	8
Lower Lea Valley	5	-	1	1	1	8
Rest of Borough	3	-	-	-	-	3
Total	12	3	3	1	3	22

The quality of football pitches has been assessed via a combination of non-technical assessments (as determined by The Football Association) and user consultation to reach and apply an agreed rating of good, standard or poor.

In a densely populated urban area such as Tower Hamlets, open spaces cater for a variety of uses at different times and pitches are predominantly located within parks and open spaces. The dual use as pitches and open recreational space limits the extent to which pitches can be preserved for formal sport use only. This means that the quality of pitches can be adversely affected by casual use. All pitches are frequently used for formal play and demand outstrips supply, meaning pitches can be overused at times. All grass pitches within Tower Hamlets were assessed as being of standard or poor quality. Good ratings are most likely to be achieved at sites, which are dedicated to football only and where access to other users is tightly controlled.

Figure 18: Grass football pitch quality by pitch size

Pitch type	Good	Standard	Poor
Adult	-	5	7
Youth 11v11	-	1	2
Youth 9v9	-	1	2
Mini 7v7	-	-	1
Mini 5v5	-	-	3
Total	-	7	15

Demand for pitches is driven by the number of teams and the number of match equivalent sessions (MES) on a pitch that each team requires to accommodate its competitive play. A total of 110 affiliated teams from 42 clubs are identified as playing matches or training on football pitches within Tower Hamlets. There are ten teams from Tower Hamlets known to be consistently playing home matches on artificial grass pitches, both 3G and sand based.

Figure 19: Breakdown of football teams

Number of teams	Adult		Youth Boys		Youth Girls			Mini Soccer		Total
	Men	Women	11v11	9v9	11v1	9v	7v7	7v7	5v5	
	41	5	24	17	1	9	-	11	6	110
Total	46		41		6			17		

Pitches have a limit of how much play they can accommodate over a certain period of time before their quality, and in turn their use, is adversely affected. As the main usage of pitches is likely to be for matches, it is appropriate for the comparable unit to be MES but may for example include training sessions and informal use. As a guide, the Football Association has set a standard number of matches that each grass pitch type should be able to accommodate.

Figure 20: Football Association guidance for match equivalent sessions

Adult pitches		Youth pitches		Mini pitches	
Pitch quality	Matches per week	Pitch quality	Matches per week	Pitch quality	Matches per week
Good	3	Good	4	Good	6
Standard	2	Standard	2	Standard	4
Poor	1	Poor	1	Poor	2

Total over or under supply of MES is calculated by:

- Establishing the total number of MES required by teams;
- Establishing the total number of MES available based on the number and quality of pitches;

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- Taking into account the number of MES slots which are actually in use against how much they should be used (known as actual spare capacity and overplay).

Figure 21: Current demand for adult 11 v 11 in MES

Analysis area	Actual spare capacity	Current overplay	Current total (over) /under supply
City Fringe	(-1)	-	(-1)
Isle of Dogs	-	2	2
Lower Lea Valley	-	10.5	10.5
Rest of Borough	-	1	1
Total	(-1)	12.5	12.5

There is a current adult shortfall totalling 12.5 MES. This equates to seven pitches at standard quality, which would provide 14 MES. MES availability could also be improved by improving the quality of existing pitches, thereby increasing the number of MES they can accommodate per week.

Figure 22: Current demand for youth 11 v 11 in MES

Analysis area	Actual spare capacity	Current overplay	Current total (over) /under supply
City Fringe	-	-	-
Isle of Dogs	(-2)	2.5	0.5
Lower Lea Valley	-	-	-
Rest of Borough	-	-	-
Total	(-2)	2.5	0.5

There is a current youth 11 v 11 shortfall totalling 0.5 MES. This shortfall could be addressed by improving the quality of existing 11 v 11 youth pitches so they can accommodate more MES per week.

Figure 23: Current demand for youth 9 v 9 in MES

Analysis area	Actual spare capacity	Current overplay	Current total (over) /under supply
City Fringe	(-0.5)	-	(-0.5)
Isle of Dogs	-	1	1
Lower Lea Valley	-	1	1
Rest of Borough	-	-	-
Total	(-0.5)	2	1.5

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There is a current youth 9 v 9 shortfall totalling 1.5 MES. This shortfall could be addressed by improving the quality of existing 9 v 9 youth pitches so they can accommodate more MES per week.

Mini 7v7 and 5v5 pitches in Tower Hamlets are currently played to capacity, with no overplay or actual spare capacity.

Third Generation Artificial Grass Pitches (3G)

There are 32 third generation artificial grass pitches (AGP) at nine locations in Tower Hamlets. All of these are considered to be accessible for community use. Two are located in schools, 10 in leisure centres, 18 in commercial facilities, one in a youth centre and one in a public park. These 3G pitches are in addition to the sand based artificial pitches identified below in the section relating to hockey.

There are several surface types that fall into the category of artificial grass pitch (AGP). The three main groups are third generation (which is also known as rubber crumb), sand (filled or dressed) and water based. Different artificial surfaces are suitable and mutually exclusive for training and competition for different sports as set out in the table below.

Figure 24: Artificial playing surface suitability

Surface	Category	Comments
Third generation (rubber crumb)	Long Pile 3G (60mm with shock pad)	Rugby surface – must comply with World Rugby type 22 and/or RFL Community Standard, requires a minimum of 60mm pile. Suitable for competitive football play if FIFA certified.
Third generation (rubber crumb)	Medium Pile 3G (55-60mm)	Preferred football surface. Suitable for competitive football play if FIFA certified. Suitable for non-contact rugby union/league practice or play.
Third generation (rubber crumb)	Short Pile 3G (40mm)	Acceptable surface for some competitive football at lower league levels if FIFA certified.
Sand	Sand Filled	Competitive hockey play and football training.
Sand	Sand Dressed	Preferred competitive hockey surface and suitable for football training.
Water	Water based	Preferred high level competitive hockey surface and suitable for football training if irrigated.

Only one of the 3G pitches (at Stepney Green) is full sized and FIFA certified, meaning it is suitable for competitive football match play. There are currently no World Rugby certified 3G surfaces in the borough.

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The quality of 3G pitches has been assessed via a combination of non-technical assessments and user consultation to reach and apply an agreed rating of good, standard or poor. The carpet of an AGP is considered to have a recommended lifespan of approximately 10 years. The majority of pitches were assessed as standard quality with only three rated as poor and two as good. Importantly, the full sized pitch suitable for competitive football match play has been assessed as good.

Figure 25: 3G pitch quality by pitch size

Pitch type	Good	Standard	Poor	Total
Short pile 22 x 12	-	1	-	1
Short pile 23 x 18	-	2	-	2
Short pile 24 x 15	-	5	-	5
Short pile 25 x 15	-	8	-	8
Short pile 30 x 20	-	4	1	5
Short pile 33 x 17.5	-	1	-	1
Short pile 36 x 20	-	1	-	1
Short pile 38 x 20	-	1	-	1
Short pile 50 x 30	-	1	2	3
Medium pile 35 x 20	-	2	-	2
Medium pile 40 x 22	-	1	-	1
Medium pile 60 x 40	1	-	-	1
Medium pile 106 x 70 (FIFA certified)	1	-	-	1
Long pile (any size)	-	-	-	0
Total	2	27	3	32

The Football Association considers high quality third generation artificial grass pitches an essential tool in promoting coach and player development. 3G pitch use for training can ensure that the use of grass pitches can be reduced to more sustainable levels with an emphasis on match play.

Football Association standards indicate that one full sized AGP can service 42 teams. On the basis there are 110 teams playing competitive football in Tower Hamlets on either natural turf or artificial turf pitches, there is a recommended borough wide need for two to three full sized 3G pitches.

The Football Association model assumes all football teams train on full sized 3G pitches when in practice a proportion of football training demand can be accommodated on smaller 3G pitches. Therefore, whilst the model suggests there is a potential shortfall of one to two full sized 3G pitches taking into account existing provision, a more appropriate planning assumption would be a need for one further 3G pitch to meet current demand.

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Cricket

There are four non-turf cricket pitches (NTPs) located across two sites. All NTPs are available for community use with three located at Victoria Park and one at Millwall Park.

There are no natural turf cricket squares in Tower Hamlets. Natural turf pitches are required for competition at higher league levels. Natural turf pitches require higher levels of maintenance and access to them has to be strictly controlled to prevent damage to the playing surface by other casual users. In the context of pitches being located in parks in densely populated areas, this poses particular financial and operational challenges, especially as demand for open space from the wider population continues to grow.

Figure 26: Cricket pitch provision by type and location

Analysis Area	Turf Pitch	Non turf pitch	Total
City Fringe	-	3	3
Isle of Dogs	-	1	1
Lower Lea Valley	-	-	-
Rest of Borough	-	-	-
Total	-	4	4

The quality of cricket pitches in Tower Hamlets has been assessed via a combination of non-technical assessments and user consultation to reach and apply an agreed rating of good, standard or poor.

In a densely populated urban area such as Tower Hamlets, open spaces cater for a variety of uses at different times and pitches are predominantly located within parks and open spaces, meaning they are subject to official and casual use. The dual use as pitches and open recreational space limits the extent to which pitches can be preserved for formal sport use only. The quality of pitches can be adversely affected by casual use.

The three NTPs at Victoria Park were rated as poor quality and the one at Millwall Park as standard quality. The NTPs at Victoria Park require replacement.

Figure 27: Cricket pitch quality

Pitch type	Good	Standard	Poor
Non turf pitch	-	1	3
Total	-	1	3

Demand for pitches is driven by the number of teams and the number of match sessions on a pitch that each team requires to accommodate its play. There are 33 senior men's cricket teams and five junior boys' teams playing

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competitive matches in Tower Hamlets as shown below, totalling 38 affiliated cricket teams. In addition to the above, three senior men's teams are playing their matches outside the borough due to lack of access to a natural turf pitch.

Capacity analysis for cricket is measured on a seasonal basis. This is due to playability (i.e. only one match is generally played per square per day at weekends or weekday evening). Wickets are traditionally rotated throughout the season to reduce wear and allow repair. Therefore, it is more accurate to assess capacity seasonally rather than weekly. The capacity of a square to accommodate matches is driven by the number and quality of wickets. This section presents the current square stock available for cricket and illustrates the number of competitive matches per season per square. An NTP is considered able to take 60 matches per season.

Total over or under supply of sessions is calculated by:

- Establishing the total number of sessions required by teams;
- Establishing the total number of sessions available based on the number of pitches;
- Taking into account the number of sessions pitches are actually in use against how much they should be used (known as actual spare capacity and overplay).

Figure 28: Current demand for cricket in match sessions

Analysis area	Actual spare capacity	Current overplay	Current total (over) /under supply
City Fringe	-	-	-
Isle of Dogs	-	10	10
Lower Lea Valley	-	108	108
Rest of Borough	-	-	-
Total	-	128	128

There is a current shortfall totalling 128 sessions on NTPs. In addition, a further 23 match sessions per season are exported to natural turf pitches outside the borough. The level of overplay indicates that there is a current shortage of two NTPs.

Rugby Union

There is only one rugby union pitch in Tower Hamlets, located at Millwall Park (Isle of Dogs Analysis Area), which is of senior size and is used by Millwall RFC for all match play. The pitch is also subject to some curricular and extra-curricular use from George Green's School.

The quality of the pitch has been assessed via a combination of non-technical assessments (in line with Rugby Football Union guidance) and user consultation to reach and apply an agreed rating of good, standard or poor.

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In a densely populated urban area such as Tower Hamlets, open spaces cater for a variety of uses at different times and pitches are predominantly located within parks and open spaces. The dual use as pitches and open recreational space limits the extent to which pitches can be preserved for formal sport use only. This means that the quality of pitches can be adversely affected by casual use and wider park use. The pitch quality at Millwall Park is rated as poor.

Demand for pitches is driven by the number of teams and the number of match equivalent sessions (MES) on a pitch that each team requires to accommodate its play. Millwall RFC is the only rugby union club in the borough and has a total of eight teams.

Figure 29: Breakdown of rugby union teams

	Number of rugby union teams				Mini
	Senior		Junior		
	Male	Female	Male	Female	
	3	1	-	-	4
Total	4		-		4

Pitches have a limit of how much play they can accommodate over a certain period of time before their quality, and in turn their use, is adversely affected. As the main usage of pitches is likely to be for matches, it is appropriate for the comparable unit to be match equivalent sessions but may for example include training sessions and informal use. As a guide, the Rugby Football Union has set a standard number of matches that a pitch should be able to accommodate. The number of MES is dependent on a combination of maintenance regime and the drainage system in place. The pitch at Millwall Park is considered to have an MES capacity of 1.5 sessions per week.

Total over or under supply of MES is calculated by:

- Establishing the total number of MES required by teams;
- Establishing the total number of MES available based on the number and quality of pitches;
- Taking into account the number of MES are actually in use against how much they should be used (known as actual spare capacity and overplay).

Figure 30: Current demand for rugby union in MES

Analysis area	Actual spare capacity	Current overplay	Current total (over) /under supply
City Fringe	-	-	-
Isle of Dogs	-	7.5	7.5
Lower Lea Valley	-	-	-
Rest of Borough	-	-	-
Total	-	7.5	7.5

There is a current shortfall totalling 7.5 MES. This equates to three pitches, assuming a standard level of quality combined with drainage system. MES availability could also be improved by improving the quality of the existing pitch, thereby increasing the number of MES they can accommodate per week. However, overplay would still remain as improvements would only provide an additional 2 MES per week. Additional capacity in the form of more grass or World Rugby compliant 3G pitches would be required to address demand.

Hockey

There are a total of three hockey suitable AGP pitches across three sites in Tower Hamlets, of which all are reported to be available for community use on some level. Two sites are leisure centres and one is a school. Two of the pitches are of a sand dressed surface type and one is of a sand filled type. All of the pitches are floodlit.

Figure 31: Hockey pitches by type and location

Analysis Area	Sand dressed	Sand filled	Total
City Fringe	1	-	1
Isle of Dogs	-	-	-
Lower Lea Valley	-	-	-
Rest of Borough	1	1	2
Total	2	1	3

The quality of hockey pitches has been assessed via a combination of non-technical assessments and user consultation to reach and apply an agreed rating of good, standard or poor.

The recently resurfaced pitch at John Orwell Leisure Centre has been graded as standard as has the pitch at St Paul's Way School. The pitch at Mile End Stadium has been graded as poor although this assessment was prior to resurfacing in summer 2017, which will improve its quality rating.

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Demand for pitches is driven by the number of teams and the number of match equivalent sessions (MES) on a pitch that each team requires to accommodate its play. Tower Hamlets has four hockey clubs providing 38 teams using AGPs within the borough.

Figure 32: Breakdown of hockey teams

Name of club	Senior Men	Senior Women	Senior Mixed	Junior Boys	Junior Girls
East London HC	6	7	-	2	2
London Royals HC	-	-	1	-	-
Tower Hamlets HC	1	-	-	-	-
Wapping HC	8	8	2	1	-
Total	15	15	3	3	2

There are a further seven senior men's, four senior women's and two senior mixed teams belonging to clubs in the borough but playing outside the borough, predominantly using the London 2012 legacy facilities at the Lea Valley Hockey & Tennis Centre.

Artificial pitch match equivalent sessions are determined by the times during which league matches take place (peak demand).

Total over or under supply of MES is calculated by:

- Establishing the total number of MES required by teams;
- Establishing the total number of MES available based peak demand periods and the number of pitches;
- Taking into account the number of MES pitches are actually in use against how much they could be used.

Figure 33: Current demand for hockey in MES

Analysis area	Actual spare capacity	Current overplay	Current exported demand	Current total (over) /under supply
City Fringe	-	-	13	13
Isle of Dogs	-	-		
Lower Lea Valley	-	-		
Rest of Borough	-	-		
Total	-	-	13	13

Currently, there is a shortfall of 13 MES, which equates to two pitches, assuming matches are played on both weekend days. Improved weekend access to St Paul's Way School could accommodate some of the displaced demand. In order to meet displaced demand in full, an additional hockey suitable AGP would be required.

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Tennis

There is a total of 47 tennis courts in Tower Hamlets, of which, 23 are unavailable for community use, most of which, are located at school sites. The courts are located across 16 sites including private sports clubs, parks, schools and leisure centres. There are dedicated court sites.

There are 27 floodlit courts in Tower Hamlets (57% of supply) across eight sites. Courts at King Edward VII Memorial Park are currently disused and will be replaced as part of the Thames Tideway Tunnel scheme, which will result in a significant re-design of the entire park.

The majority of courts were assessed as standard quality (34 courts – 72%), whilst the remaining courts were assessed as either good (two courts – 4%) or poor (11 courts – 24%) quality.

Figure 34: Quality of tennis courts

Surface type	Good	Standard	Poor	Total
Macadam	2	23	7	32
Artificial Turf	-	6	-	6
Clay	-	-	-	-
Grass	-	-	-	-
Tarmac	-	5	4	9
Total	2	34	11	47

16 of the 24 courts available for community use are in publicly accessible open spaces. Ten of these are of standard quality, two are of good quality and four are of poor quality. Two of the poor quality courts are subject to replacement as part of the King Edward VII Memorial Park works. Six are located within sports centre. Of these, three are rated poor and the other three as standard. Two are located in a school and are rated as standard.

There are no traditional tennis clubs in Tower Hamlets and as such there is limited competitive tennis. Demand for tennis courts is therefore predominantly focused on casual players and less formal play. There are in excess of 10,000 bookings for tennis courts in parks per year, with further capacity remaining.

Bowls

There are three used natural turf bowling greens in Tower Hamlets. These are located in Victoria Park, Millwall Park and Poplar Recreation Ground. The disused bowling green at King Edward VII Memorial Park will be removed as part of the redesign of the site.

One of the greens was assessed as standard and two as poor quality. Two of the clubs using the greens have reported that maintenance regimes have

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been improved over recent years. All three greens are owned and maintained by the council and clubs pay an annual use fee.

There are four bowling clubs identified in Tower Hamlets, most with multiple teams playing various evenings and afternoons throughout the week. Many clubs, teams and bowlers may play in a number of leagues simultaneously throughout the week and so although there may be a large number of teams many are made up of the same players, thus representing a smaller player base.

Bowling has experienced an overall decline in participation nationally and in most cases the fall in numbers has been attributed to ageing players, with a lack of younger players coming through. Membership numbers for clubs are low and range from 14 to 38.

It is generally considered by Bowls England that a green accommodating fewer than 60 playing members has spare capacity for further play. Consideration should also be given to the sustainability of greens which operate with a playing membership of fewer than 20. Based on current membership numbers of clubs and Bowls England advice, capacity is considered to be in excess of demand.

Athletics

There is one county athletics track with a synthetic surface in Tower Hamlets. It is partially floodlit and located at Mile End Park Leisure Centre and Stadium. The track is owned by the council and managed by the council's leisure centre contractor.

The track is rated as standard quality having been refurbished in 2011 in the run up to the London 2012 Olympics and is fully certified by UK Athletics to host high level competition, offering a full range of athletics facilities. The athletics infield also serves as a grass football pitch to meet demand for higher level football league facilities, requiring an enclosed pitch with ancillary stadium facilities. The dual use places limitations on when certain infield sports can take place in order to avoid damage while conversely the use as a football pitch impacts on the quality of the infield for athletics uses.

Victoria Park Harriers and Tower Hamlets Athletics Club is the only club in Tower Hamlets. The club reports to have approximately 270 senior and 310 junior members and has plans to continue to increase these numbers.

Demand for running extends further than athletics tracks and the wider recreational running and fitness market has grown over recent years. A number of new running groups continue to be established. As groups grow, some have begun to offer track training sessions and even branch into track and field competitions.

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England Athletics guidance states that for a running track to be sustainable it should be hosting at least 200 members. The Tower Hamlets track is therefore considered sustainable and capable of meeting current demand, subject to track quality being maintained.

CHAPTER 3: STAKEHOLDER AND RESIDENT CONSULTATION

3.1 CHAPTER OVERVIEW

This chapter presents a summary of resident and stakeholder perspectives on parks and open spaces. It draws on existing consultations, data and intelligence about common issues and complaints, market research and three stakeholder events carried out specifically to help with the development of this strategy. The findings are organised into a section for residents and stakeholders and young people aged 16 and under. Each section lists sources of information and findings. The key findings are summarised below.

3.2 FINDINGS

Adult residents and other stakeholders:

- Resident satisfaction with parks and open spaces in Tower Hamlets is high.
- Parks are frequently used by residents; the most popular reason for visiting parks and open spaces is to spend time with friends and family.
- Residents recognise that parks and open spaces play a valuable role in the lives of Tower Hamlets residents and have a positive impact on the community.
- Some stakeholders would like more open space dedicated to organised sports, while a majority would prefer parks to be primarily a space for relaxation and socialising.
- In addition to the provision of facilities, making parks safe and maintaining parks are viewed as important priorities for adult residents and other stakeholders.

Young people:

- The majority of young people in Tower Hamlets are very satisfied with the parks and open spaces.
- Having places to spend time with friends is a priority for young people in Tower Hamlets. Primary school pupils in Tower Hamlets said having 'more places where I can go to spend time with my friends' would improve their lives more than anything else.
- The top priorities for open spaces for young people were having places for relaxation; sports facilities, and arts and events.
- Safety is a key issue for young people and may impact on whether young people feel able to use parks and open spaces.

3.3 RESIDENTS AND STAKEHOLDERS (AGED 16+)

A range of information has been used to develop a broad understanding of resident and stakeholder perspectives on parks and open spaces. This includes:

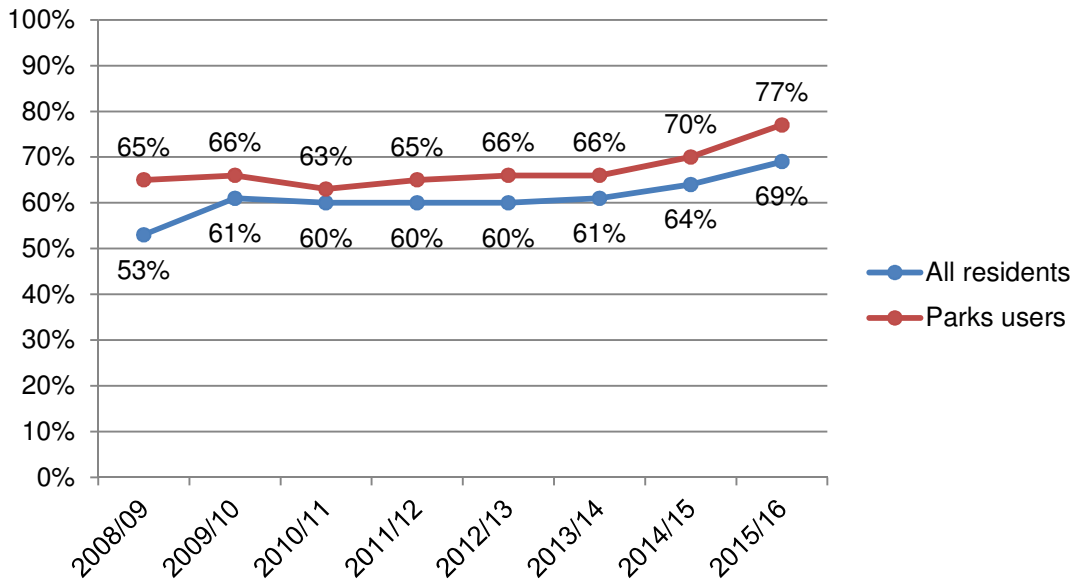
- A representative sample telephone survey of 708 Tower Hamlets residents, weighted to reflect the demographic make up of the population carried out in 2016 to support the development of this strategy (known as the Culture, Leisure and Open Spaces survey (CLOSS), 2016). Detailed results from the survey can be found in the appendix.
- Two park and open spaces stakeholder workshops held in 2016 to support the development of this strategy. Further details can be found in the appendix.
- Enquiries and feedback about parks and open spaces including feedback from 'Find It, Fix It, Love It,' the council's online feedback tool.
- Existing surveys and stakeholder and consultation events:
 - Health and Wellbeing Strategy consultation results, January 2016.
 - Local Plan consultation results, December 2016.
 - Community Plan consultation responses, 2015.
 - The Tower Hamlets Annual Resident Survey 2016.
 - Aging Well Strategy Consultation, 2016.
 - Budget consultation 2016 – comprising of a telephone survey of 1065 residents and face-to-face engagement with 200 residents.
 - Individual consultations on parks including the Ford Square / Cavell St redevelopment and the Quietway 6 cycle route consultation.
- A selection of national consultation responses, relevant to parks and open spaces.

In combination, this data shows:

[A] Resident satisfaction with parks and open spaces is high.

Resident satisfaction with parks has been steadily increasing over the last seven years, according to the Tower Hamlets Annual Residents Survey. 69% of residents rated the service as 'good,' 'very good' or 'excellent' in 2015/16, which is an increase of 16 percentage points since 2008/9. Unsurprisingly, residents who are very satisfied with their local open spaces are also frequent users. Satisfaction among users of parks and open spaces was even higher, with 77% of users rating the service as 'good,' 'very good' or 'excellent' in 2015/16.'

Figure 20: Percentage of residents satisfied⁴ with Parks and Open Spaces, according to the Annual Residents Survey



Residents are keen for the positive aspects of parks and open spaces to be recognised. Positive feedback from residents about Tower Hamlets parks and open spaces has been captured via the council’s ‘Find it, Fix it, Love It’ tool with parks and open spaces receiving the highest amount of positive feedback for any category (November 2015 - November 2016). 96 out of the 325 reports for parks and open spaces were giving positive feedback about their features; which equated to 29.5% of the total number of reports. In line with this positive feedback, 88% of residents would recommend a park in Tower Hamlets to a friend (CLOSS, 2016) and Victoria Park, as chosen by the public, has won the People’s Choice Award in 2012, 2014, 2015 and was a joint winner for 2016.

[B] Parks are frequently used by residents, and most often this is to spend time with friends and family.

A significant proportion of residents regularly use parks and open spaces: 71% of residents said they used parks at least once a month and 44% said they use them at least once a week (CLOSS, 2016).

‘Spending time with family and friends’ was the main reason given when residents were asked what their reasons were for visiting parks and open spaces, with the top three reasons among Tower Hamlets residents for visiting parks as follows.

⁴ ‘Satisfied’ means the service was rated good, very good or excellent.

Figure 36: Top three responses to 'Which of the following are your main reasons for visiting a park or open space?' (CLOSS, 2016)

Reason for visiting a park or open space	% of residents
Spending time with family and friends	81%
Relaxation	73%
On route to location / shortcut	70%

[C] Residents recognise that parks and open spaces have a valuable role for individuals and the broader community.

80% of participants in the Budget Consultation 2016 said that they, or a member of their family, used or benefitted from Parks and Open Spaces - the highest response for any of the council services they were asked about.⁵ 70% of residents believe that parks help to bring people of different backgrounds together, according to the culture, leisure and opens spaces survey, 2016.

At the Health and Wellbeing Strategy consultation 2016, parks were the second most popular choice for ways residents like to stay healthy.⁶ The results of the Culture, Leisure and Open Spaces survey, 2016 indicate that 83% of residents agree that parks in Tower Hamlets provide them with opportunities to be physically active. 47% actually use it for a fitness activity. These results indicate a gap between the number of residents who recognise that parks provide them with an opportunity to be physically active, and those that take advantage of that opportunity. Accessing parks and open spaces does not appear to be a widespread issue for residents: according to the same survey 93% of residents agree that they can access and use their local park easily.

[D] Residents hold different views on priorities for parks and open spaces in Tower Hamlets.

The Culture, Leisure and Open Spaces survey 2016 was used to identify priorities for Tower Hamlets' residents for parks and open spaces:

⁵ Participants were asked "Which of the following, if any, do you or other members of your household use or benefit from?"⁵ Tower Hamlets Budget consultation, 2016.

⁶ Participants were asked "How they would like to stay healthy?" and provided with the following options: Walking; Park; Gym/circuit training; Swimming; Cycling; Yoga/Pilates; Allotment/gardens; Martial arts; Boxing; Indoor golf; Dancing; Jogging; City farms and Hula-hooping. Tower Hamlets Health and Wellbeing Strategy consultation, 2016.

Figure 37: Top three responses to 'Which of the three following are the most important uses of parks and open spaces for you personally?' (CLOSS, 2016)

Priorities for parks and open spaces	% of residents including the topic in their top 3 priorities
Places to sit and relax with friends	74%
Children's play facilities	63%
Making parks safer places	41%
Areas used as sport / playing pitches	36%

Examining segmented groups' responses, a higher ratio of Asian people (76%) responded that children's play facilities are the most important use of the parks (overall 63%, White 56%).

The fourth priority for residents as a whole was using space for sports and playing pitches. Participants in each stakeholder workshop, previous local consultations, the aging well consultation and the youth council consultation were divided over the further development of sports facilities in parks. Some felt that it encouraged anti-social behaviour, whilst others felt it prevented it. There was strong community representation from local cricket clubs at the second parks and open spaces stakeholder event for the creation of a new cricket pitch. There was discussion about finding a successful compromise by limiting the space set asked for sports facilities and ensuring facilities were in keeping with the style of the park'.

Participants at the parks and open spaces workshops said they would welcome more quiet and peaceful areas that allowed them to seek respite away from the hustle and bustle of the rest of the park. Play parks were unanimously viewed by participants in each stakeholder workshop, previous local consultations, the aging well consultation and the youth council consultation as being an important facility in any park and felt that it was an important area for further development.

Other high priorities for parks for residents were refreshments and toilets facilities (32%); improving the variety of plants and wildlife (27%) and outdoor gyms (12%) (CLOSS, 2016). The history and culture of parks was considered important by attendees of the parks stakeholder workshops, previous local consultations and especially the aging well consultation. Participants thought more should be done to promote and celebrate this aspect of parks.

[E] Enhancing safety is viewed as a priority for parks and open spaces

Nearly 4 in 10 residents (39%) said that crime was one of their top personal concerns in the Annual Residents Survey 2016, making it the top concern of residents overall. In line with this, the Culture, Leisure and Open Spaces survey identified that 41% of residents think that making parks and open spaces in Tower Hamlets safer is a priority. Anti-Social Behaviour (ASB) was

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a prevalent and pervasive concern for participants of each stakeholder workshop, previous local consultations, the aging well consultation and the youth council consultation. Participants at all consultation events thought that ASB led to increases in maintenance costs due to the misuse of play parks and facilities. Limiting opening times in ASB hotspots over the last few years was cited as being a successful measure, but many participants thought that this also hampers the enjoyment of these spaces.

A National study entitled 'Reaping the Rewards of Superdiversity' cited parks as the leading way for people of different backgrounds to integrate more thoroughly; therefore increasing or improving parks and open spaces should lead to more cohesion in the community and reduce the risk of ASB.

Maintenance of parks is viewed as being related to safety, but there are some aspects of maintenance which are distinct from safety so it is considered as a separate point below - the key point from stakeholders was that effective maintenance can help to manage ASB in parks.

Specific issues that arise about safety in parks include cycling. Mixed views were heard at consultation events about recurring operational concerns relating to how parks are managed for different user groups. There was strong advocacy for cycling (because, for example, it's a cost effective way to travel and keep healthy) but also concern that irresponsible cycling endangers the health and safety of others. There was a perception among some in the Aging Well and Youth Council Consultations that dog walking and wildlife habitats in parks could also pose a danger to their health, and some people said that the presence of animals put them off visiting certain areas.

[F] Residents recognise that most open spaces are well maintained

More than three-quarters of residents (78%) think that Tower Hamlets parks and open spaces are well maintained (CLOSS, 2016). However, stakeholder groups identified maintenance as an issue and 32% of the correspondence sent to the Complaints Team is about maintenance of parks (this is the largest category of complaints and enquiries sent to the Complaints Team for Parks – accounting for 72 cases out of a total of 229). Attendees of the stakeholder groups believed that any improvements in parks should accentuate the beauty of it rather than detract from it. Care should be taken in implementing security features that fit in with the overall look of the park. The participants of the stakeholder events and the Ageing well event felt it was important to be involved in the horticultural maintenance parks and open spaces. They felt some decisions around pruning, grass cutting and planting did not consider long term sustainability, the impact on the ecosystem or the growth pattern (such as flowering buds). They wanted to be involved in establishing best practice or undertaking the maintenance themselves.

[G] There is appetite for community management and participation in the development of parks and open spaces

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In general, good communication from the council about parks and open spaces was identified as important by the stakeholder groups. Specific comments from the parks stakeholder groups indicate the importance of the council communicating with residents and other stakeholders in a timely and clear fashion especially regarding decisions impacting parks and open spaces. There was a discussion about the council's transparency regarding income raised from events held in parks, and whether the council could be clearer about how it is re-invested into improving parks. The stakeholder groups thought better transparency in this area could help persuade people of the benefits of holding events in parks.

There is evidence of a wider group of stakeholders wanting a say in council services, and specifically parks. Evidence from the Annual Residents Survey (2016) suggests that there is a mixed view among residents about whether the Council involve residents in decision making (55% felt that the Council does involve residents when making decisions, however 36% disagreed). The results from the Budget Consultation, 2016 found that nearly a third of businesses (31%) would like to be involved in discussions about parks and open spaces.

A popular suggestion for the council to save money, as voted for by residents in the Budget Consultation 2016, was for 'the Council to work with Voluntary and Community Organisations to deliver services'. In line with this appetite, there was support at park stakeholder events for extending the use of 'community management arrangements,' which are understood to be agreements between the Council and community led organisations to undertake tasks within or related to parks and open spaces. This was also a finding from the Community Plan consultation. Feedback from the stakeholder workshops suggested that these arrangements did not have to be overly formal, but they should be clear and appropriate to the group. The top five elements they felt made community arrangements a success were:

- Support from the Council.
- Management Team with the right knowledge and experience.
- A committed team.
- Volunteers with time to give.
- Positive motivation from its members

3.4 YOUNG PEOPLE AND PARKS AND OPEN SPACES

A number of sources were drawn on to develop a broad understanding of young people's perspectives on parks and open spaces.

- A stakeholder workshop with members of the Youth Council was held in November 2016 (further details available at the appendix, table 2).
- Existing surveys and local consultation responses were considered:
 - Children and Young People Plan, Needs Assessment
 - Pupil Attitudes Survey, 2013 and 2015

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- National consultation responses were reviewed.

In combination, this data shows:

[A] The majority of young people are satisfied with their parks

Satisfaction with parks and open spaces is relatively high among young people. The majority of pupils (59%) thought that parks and play areas in their local area were 'very good' or 'good.' 15% thought parks and open spaces in their local areas were 'bad' or 'very bad' (Pupil Attitude Survey, 2015). Primary pupils were more likely to say that they thought parks and play areas were 'good' or 'very good' (70%) while secondary pupils were less likely to say so (50%).

[B] And they use them frequently

Young people at school in Tower Hamlets use their local park frequently. 65% of primary school pupils and 59% of secondary school pupils said they had been to a local park or playground in the last four weeks (Pupil Attitude Survey, 2015).

[C] The top priority is to have a free space to socialise

Young people value places where they can socialise. In the Pupil Attitude Survey 2015, almost half (47%) of primary pupils and 43% of secondary pupils said that 'more places where they could go to spend time with their friends' was the thing that would most improve their lives. It was the most common response for primary pupils and the third most common response for secondary pupils.

Parks are likely to be highly valued by young people because they are a place where they can socialise with friends for free. In the 2015 Pupil Attitude Survey, around one in five pupils said that cost was a barrier to taking part in activities. The provision of space to socialise for free is likely to be particularly important for young people who live in urban settings like Tower Hamlets, because of the limited space available. We know from staff feedback that a large number of families in Tower Hamlets live in homes with little or no outside space (The Children and Families Plan, 2016).

Participants in the youth engagement event recognised that there is limited space available in parks and open spaces, and thought the following uses of open spaces were the most important:

- An environment to relax in, benefitting people of all ages
- A space for sports facilities that people can use
- A place for music and arts events

Participants scored the following uses of space as a low priority:

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- Education. Participants commented that they “did not want their park to be a school” and that parks were a place to “relax and get away from it all.”
- Using the space to exercise pets, and to build wildlife habitats were both viewed less positively. Similar objections were put forward for both uses of space. Some participants expressed that they felt intimidated by animals. Others felt that areas should be assigned for both and the limitations be made clear.

The Children and Families Plan states many families have to use public spaces for outside play with children, since space for children to play at home can be limited. It is known that a large number of families live in homes with little or no outside space.

[D] Safety is a significant concern for young people

Safety is a key concern for young people going to school in Tower Hamlets and may be a barrier to play and leisure. 78% of secondary school pupils said they feel quite safe or very safe in the area where they live. However, 16.3% of pupils worry about being a victim of crime (Pupil Attitude Survey, 2015).

Tackling security concerns in parks could help young people feel more able to use parks. Around 1 in 5 (19%) pupils said ‘more help to feel safe at school and in my local area’ was among the top three things that would improve their life (Pupil Attitude survey, 2015). Participants in the youth engagement event noted that security in parks was an issue. The group thought that elements of parks could be abused and that ASB could impact on how much other users of the park were able to enjoy them. The group noted that scooters and bikes could also be a safety hazard.

[E] Anti-social behaviour is an on-going challenge

Groups of young people in Tower Hamlets who socialise in public spaces can face challenges, as staff and resident feedback indicates that some people can perceive groups of young people in a negative light (The Children and Families Plan, 2016).

Participants in the Youth Council discussed feeling intimidated by large groups in parks and recognised that large groups cause problems in parks. As a group they advocated implementing security features to make parks safer.

CHAPTER 4: OPEN SPACE DEMAND IN A CHANGING AND GROWING BOROUGH

PART A: DEMOGRAPHIC CHANGE

4.1 METHODOLOGY

For the development of London Plan, the Council uses a bespoke population data set called 'the Local Plan development trajectory and the GLA's online projection model, Witan'. This data set, however, is only available for Tower Hamlets and has limited breakdown by ethnicity, age and other characteristics. In order to gain a wider picture of population make up and change, this chapter also draws on GLA SHLAA and Census 2011 data as well as (for the purpose of the playing pitch needs assessment in particular)

4.2 FINDINGS

- Tower Hamlets has very high population density. The population density of the borough will increase by 25% during the time span of this strategy, making it the most densely populated borough in the country.
- The borough has larger young adult population (20-39 years old, 49%) and relatively smaller over 60 population (7%) compared with the rest of London. The higher proportion of the young adults in the population makeup will continue.
- The borough is, and will continue to be, very diverse. BME groups will continue to make up the majority of the borough residents.
- Deprivation remains an issue in Tower Hamlets: 58% are in the most deprived 20% of LSOAs nationally (*borough rank = 6th highest in England*).
- Health indicators show that there are still gaps between the health of the borough residents and that of the national average. Although that the outdoor physical activities is not the only factor that contribute to the improvement of health, it is widely known that it improves people's physical and mental health. It is also documented that households with the lowest income level are less likely to engage in physical activity.

Population and density profile – now and in the future

Tower Hamlets covers an area of 7.64 square miles (19.78km²), which is one of the smallest among local authorities in England (320th among the 326 districts in England; 28th among 33 London local authorities).

GLA SHLAA-based population projections (2015 round) estimate that the borough's current population in 2016 is 297,805. The population density of the borough in 2016 is 15,056 people/km² which is 2.7 times more than the density of London (5,567 people/km²).

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This highlights the borough's high population density across London, certainly the country. It is projected that the population of Tower Hamlets will have the highest percentage growth (25% increase) in England over 10 years from mid-2014 until mid-2024.

Figure 38: London boroughs population growth, 2016 to 2026⁷

	2016	2026	Projected change over 10 years	Percentage change over 10 years
Tower Hamlets	297,805	364,542	66,737	22%
Barking and Dagenham	205,773	237,246	31,473	15%
Newham	337,378	383,891	46,513	14%
Camden	240,595	257,746	17,151	7%
Islington	228,397	249,273	20,876	9%
Redbridge	301,022	331,290	30,268	10%
Hackney	270,912	306,513	35,601	13%
Kingston upon Thames	173,853	187,901	14,048	8%

The population density of the borough will increase from 15,056 to 18,430 people per km² between today and 2026 (22 %). In 2026, the population density of the borough will be larger than the one of Islington (16,775 people per km²), which suggest that Tower Hamlets is set to become the most densely populated borough across London and the country by 2026.

It is reasonable to assume that the demand for parks and open spaces in the Borough will increase next 10 years and this projected population increase will put further pressure on the parks and open spaces in the borough.

Age profile – now and in the future

Below is the current and future age profile of the Borough's population. The segmented information is useful to analyse the parks and open space demand now and in the future.

The age profile of the borough population indicates that the borough has larger young adult population (20-39 years old, 49%) and relatively smaller over 60 population (7%) compared with London (25%, 16% respectively).

⁷ GLA 2015 round SHLAA-based capped household size model population projections.

Figure 39: Projected population in age in 2016: Tower Hamlets and London⁸

Age	Tower Hamlets	%	London	%
0-9	40,362	14	1,200,875	14
10-19	30,339	10	935,000	11
20-29	77,354	26	1,452,603	17
30-39	69,510	23	1,608,605	18
40-49	34,497	12	1,209,264	14
50-59	21,317	7	979,966	11
60-69	12,679	4	656,919	8
70-79	6,977	2	420,014	5
80-89	4,039	1	229,527	3
90+	732	0	47,979	1
Total	297,805	100	8,750,754	100

The table below shows the projected borough population's age profile in 2016, 2021 and 2026.

Figure 40: Tower Hamlets projected population in age in 2016, 2021 and 2026⁹

Age	2016	%	2021	%	2026	%
0-9	40,362	14	45,011	13	51,295	13
10-19	30,339	10	35,070	10	40,729	11
20-29	77,354	26	80,838	24	85,886	22
30-39	69,510	23	78,968	23	87,749	23
40-49	34,497	12	42,967	13	52,962	14
50-59	21,317	7	25,958	8	31,400	8
60-69	12,679	4	15,418	5	18,960	5
70-79	6,977	2	8,033	2	10,264	3
80-89	4,039	1	4,340	1	4,610	1
90+	732	0	1,097	0	1,485	0
Total	297,805	100	337,701	100	385,339	100

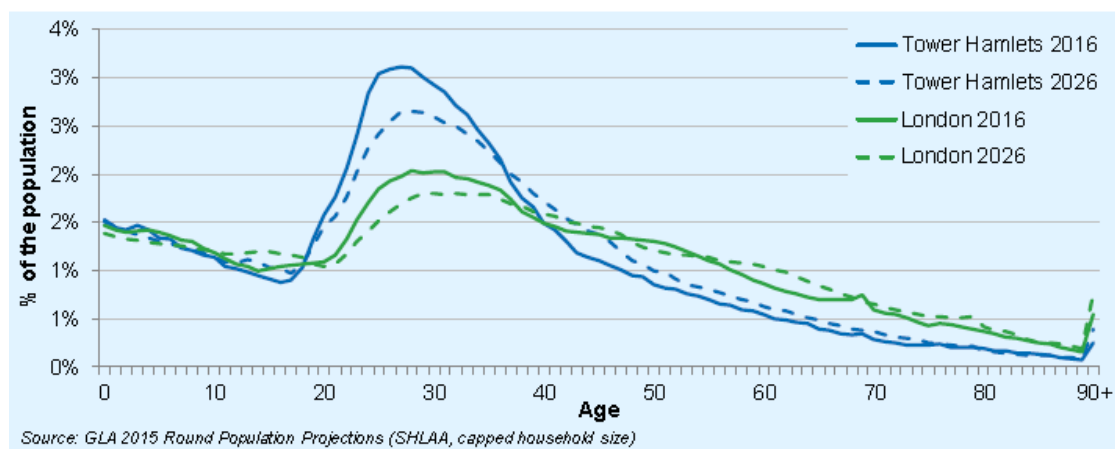
This table suggests that the make-up of these age groups is expected to remain largely unchanged the next 10 years, although the population of each group will increase steadily.

The figure below shows a high proportion of young adults aged 20-40 in the population. It is projected that the higher proportion of the young adults in the population makeup will also continue, although the group would be slightly less dominant in 2026.

⁸ GLA 2015 round SHLAA-based capped household size model population projections.

⁹ Projections were produced using the Local Plan development trajectory and the GLA's online projection model, Witan.

Figure 41: Population projections by single year of age, 2016 and 2026¹⁰



The market research shows that the younger age group use parks and open spaces more (50% of the 16-24 year-old; 46% of 25-34 and 49% of 35-44), compared with the older counterparts. Considering the growing population of the borough, the demand for the parks and open spaces

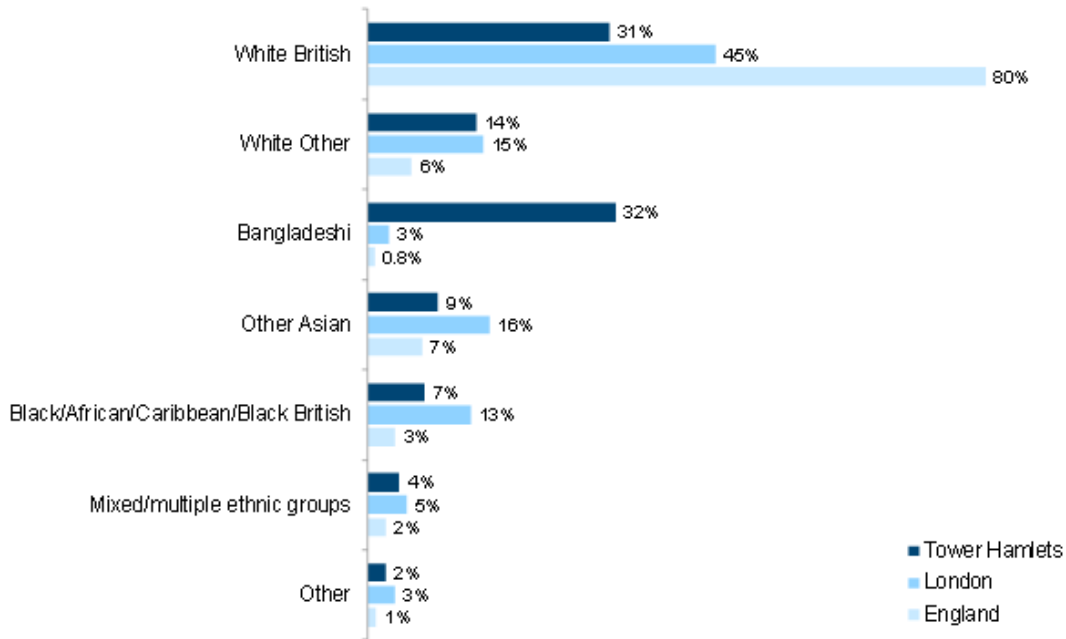
Ethnicity profile – now and in the future

The sections below provide an ethnic breakdown of the borough’s population, now and in the future.

According to the 2011 census, the Bangladeshi community made up 32% of the population of the borough, which was significantly larger than that of London (3%) or England (0.8%). White British comprised 31% of the borough’s population, which was considerably lower than London (45%) and England (80%).

¹⁰ GLA 2015 round SHLAA-based capped household size model population projections.

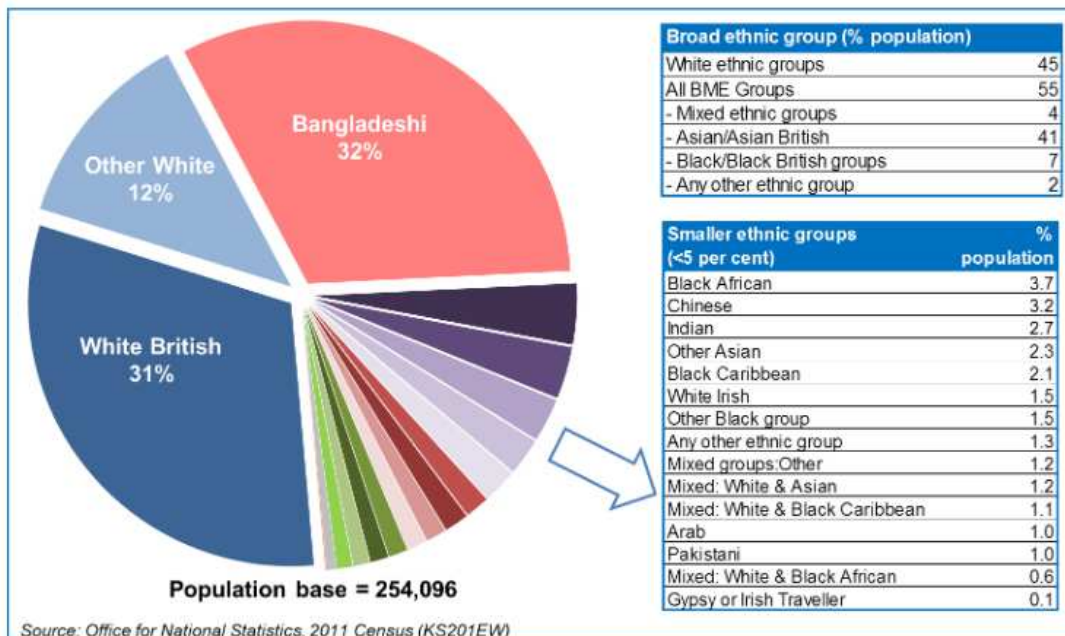
Figure 42: Proportion of the population by ethnic group 2011¹¹



Source: ONS Census 2011

The figure below shows the borough’s diverse population. In addition to the three large groups, in 2011, a number of smaller groups made up about 25% of the population (hyper diversity).

Figure 43: Tower Hamlets population by ethnic group¹²



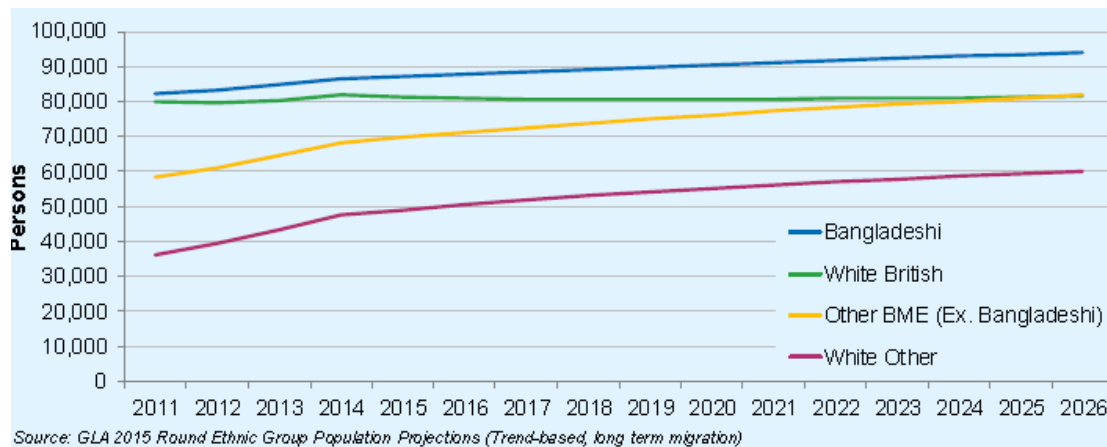
¹¹ Office for National Statistics, Census 2011.

¹² Office for National Statistics, Census 2011.

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GLA projections (illustrated in the figure below) show that the BME groups will continue to make up the majority of the borough residents. The white British population is projected to see the smallest increase, with 1% growth over the period from 2016 until 2026, while the Bangladeshi population is projected to grow by 7%, Other BME (excluding Bangladeshi) will grow by 15%, and the 'white other' by 19%. However, the projections of ethnic groups remain uncertain, partly due to the UK leaving the European Union.

Figure 44: Population projections by ethnic group, 2011 to 2026¹³



Deprivation, health and location

The deprivation level of the borough remains widespread, although it has fewer of the most highly deprived areas in England than earlier.

24% of Tower Hamlets LSOAs¹⁴ are highly deprived and are in the 10% most deprived in England – the borough ranks as 24th highest out of 326 areas in England. However, none of the borough's LSOAs appear in the most severely deprived areas in England (the most deprived 1% of areas) – these areas are all outside London.

Map 1 shows the Index of Multiple Deprivation results in Tower Hamlets by LSOAs. The more deprived areas are shown in darker colour.

¹³ GLA 2015 Round Ethnic Group Population Projections (Trend-based, long term migration)

¹⁴ LSOAs are the small area level within a local authority to measure deprivation across England.

As the map shows, the most deprived areas – which fall into the most deprived 5% of areas nationally – are mainly clustered in the east of the borough in the Lansbury and Mile End area. The least deprived areas in the borough are mainly in the Isle of Dogs, including the Blackwall and Cubitt Town and Canary Wharf wards, and the riverside areas of St. Katharine's Dock and Wapping.

Green space is linked to greater levels of physical activity and associated health benefits¹⁵. Farrell et al. examined the physical inactivity of England's population by analysing data from the Active People Survey (APS) on over a million individuals. It found that people with the lowest household income were found to be around 30% more likely not to engage in any physical activity whatsoever, whereas those with the highest level of income only had a 10% chance of being completely physically inactive.¹⁶ Panel data also showed inequalities in physical activity levels when measuring local area deprivation.¹⁷ This means that the parks and open spaces contribute to health of the public, but households with the lowest income level are less likely to engage in physical activity, which may lead to poor health.

The Joint Strategic Needs Assessment Summary Document (2015) shows that for 'Healthy life expectancy' (an estimate of how many years residents may live in good health i.e. without disabilities) Tower Hamlets has one of the highest proportion of years spent in disability in the country for both males and females. In 2011-2013, for males, Tower Hamlets ranked lowest (150th of 150) and females 145th across local authorities in England.

Healthy Life expectancy at birth:

- Male: 53.6 years compared to 63.3 years nationally (2011-13)
- Female: 57.1 years compared to 63.9 years nationally (2011-13)

The Census 2011 showed that 13.5% of the Tower Hamlets residents (34,300) stated that they had a long-term health problem or disability that limited their day to day activities. This is slightly lower than the regional and national rates (14.1% in London and 17.6% England).

¹⁵ Public Health England (2014) 'Local action on health inequalities: Improving access to green spaces', Health Equity Evidence Review 8: September 2014, p. 13.

¹⁶ Farrell L, Hollingsworth B, Propper C, Shields MA. (2013) 'The Socioeconomic Gradient in Physical Inactivity in England. Working Paper No. 13/311': The Centre for Market and Public Organisation, University of Bristol; [Online] <http://www.bristol.ac.uk/cmppo/publications/papers/2013/wp311.pdf>.

¹⁷ Public Health England (2014) 'Local action on health inequalities: Improving access to green spaces', Health Equity Evidence Review 8: September 2014, p. 15.

PART B: FUTURE DEMAND FOR NEW OPEN SPACE, PITCHES AND OUTDOOR SPORTS FACILITIES

4.3 METHODOLOGY

The demographic projections for the borough, together with the extensive catchment area analysis, and an understanding of where in the borough the highest levels of growth are expected has informed Part B of this document. Part B identifies the quantity of open space that will be required and where new open space should be secured as a priority. Part B also uses demand modelling to assess future demand for playing pitches and outdoor sports facilities. Finally, Part B sets out some high level principles for the nature and function of future open space based on resident engagement and to harness benefits open for health and well-being.

4.4 FINDINGS

- The greatly increasing demand for land, especially for housing, in recent years has put pressure on the existing parks and open spaces in the borough, which covers a relatively small area.
- Population projections show that more wards will have more pronounced open space deficiency by 2031: only two wards (Mile End and Bow East) are projected to have above 1.2 ha/ 1,000 residents, which is the Tower Hamlets standard.
- Large parts of the borough, where significant population increase is expected, are beyond walking distance (400 m) from parks above 2ha. The following areas will be particularly affected by this: Whitechapel, Fish Island, Bromley-by-Bow, Poplar Riverside and the Isle of Dogs.
- Maps 10 and 11 highlight that some of the most deprived wards, mainly in the Whitechapel area and along the eastern borough boundary, have low levels of accessibility to and quantity of open space whilst also projected to see some of the most intense population growth. These areas also have some of the lowest levels of engagement in physical activity.
- Modelling indicates that existing shortfalls of outdoor provision for football, 3G pitches, cricket, rugby union and hockey will increase as a result of population growth. Existing provision for tennis, bowls and athletics has sufficient capacity to meet future demand.
- Whilst outdoor physical activity is not the only factor that contributes to the improvement of well-being, it is widely known that it improves people's physical and mental health. The provision of parks and open space in the borough can contribute to the improvement of the health of the borough residents. Provision of playing pitches may contribute to this.
- Evidence indicates, that relaxing and spending time with friends and families, including children, are the most important use of the parks and it is likely to remain so.

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Future quantitative demand for publicly accessible open space

The table below provides a detailed breakdown of the anticipated demand for publicly accessible open space based on projected population growth, using the local 1.2ha/1,000 residents open space standard. The table shows that based on population growth, the open space deficit will continue to grow if the current amount of open space in the borough stays the same.

There is limited scope to provide additional open space and it will be important to protect existing provision through effective Local Plan policies. The increasing demand on existing space also points to the need for more robust design and management approaches to ensure that higher levels of use can be sustained on sites.

Figure 45: Future demand for open space (2016/17 to 2030/31)

Year	Provision: No. of Hectares	Projected Population	Demand (Hectares)	Deficit / Surplus	Deficit / Surplus (% of Provision)
2016/17	260.58	297.800	357.37	-96.78	-37.14
2020/21	260.58	325.100	390.93	-129.54	-49.71
2025/26	260.58	383.100	459.68	-199.1	-76.4
2030/31	260.58	388.600	466.38	-205.79	-78.97

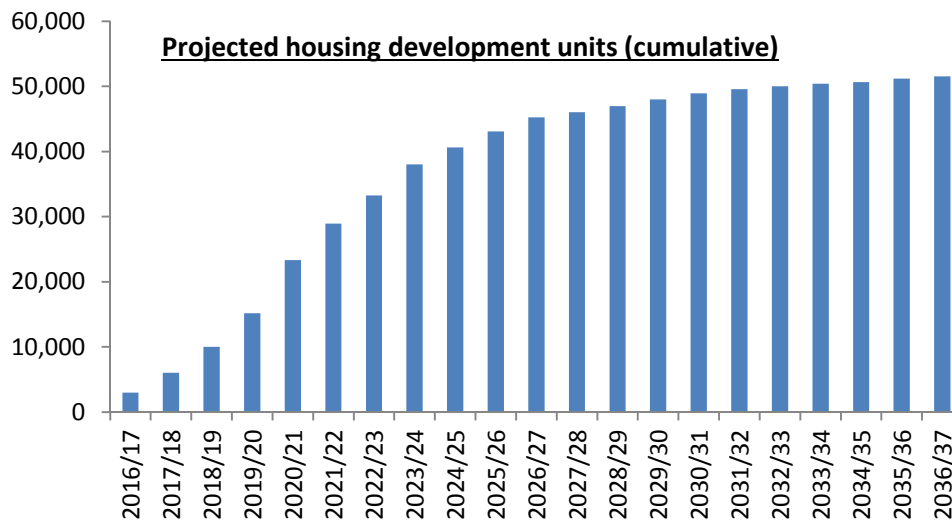
Future locality demand for publicly accessible open space

The projected housing development is expected to be the major driver of the borough's future population increase. As the graph below shows, about 45,000 housing units are planned to be developed in the borough during the period between 2016/17 and 2026/27 and this rises further to 49,000 by 2030/31.

Figure 46: Projected housing development units (cumulative)¹⁸

¹⁸ Projections were produced using the Local Plan development trajectory and the GLA's online projection model, Witan.

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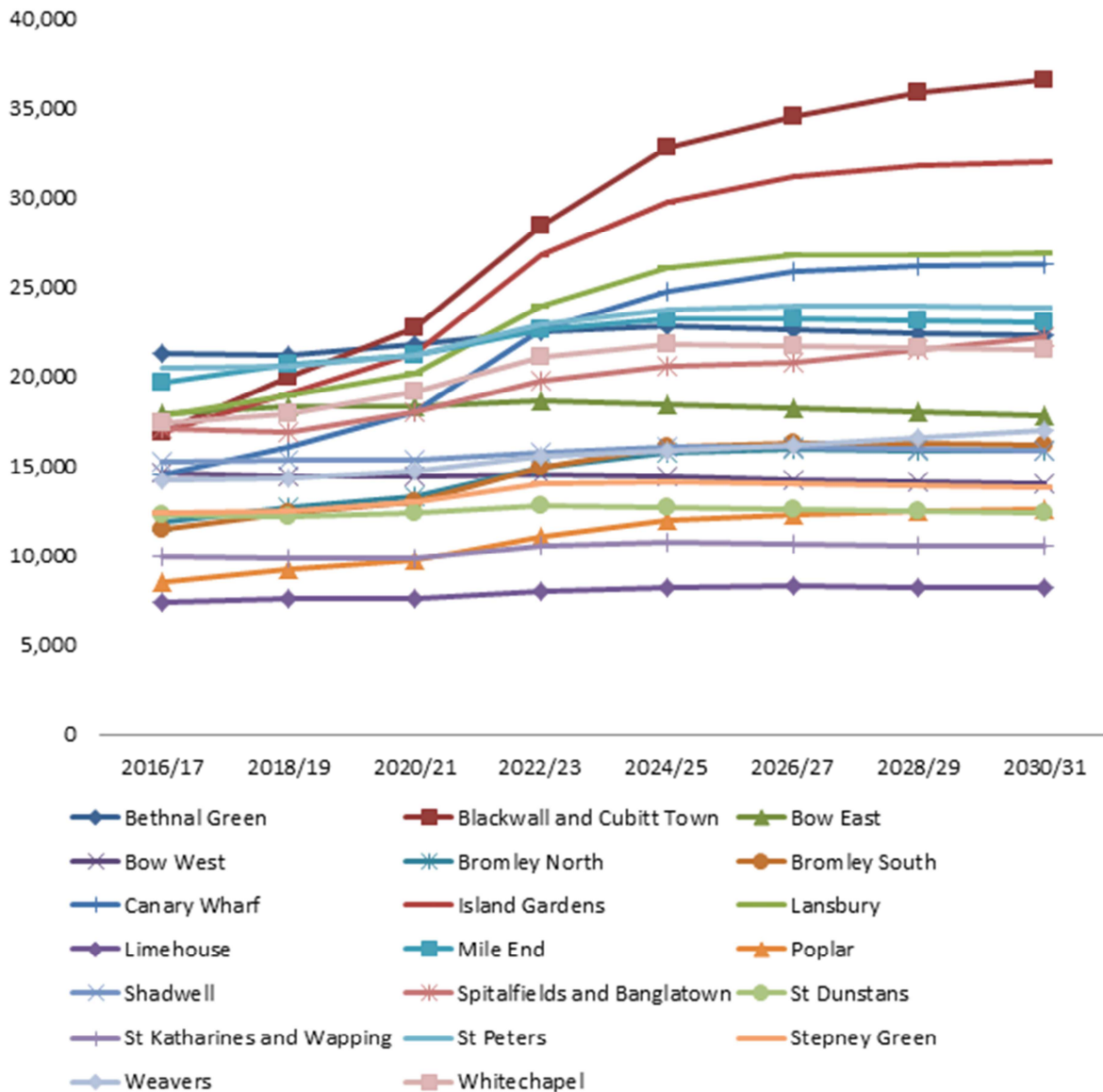


The graph below shows the projected population growth to 2030/31 by ward. The trend, while easing off towards the mid-2020s, is set to continue along the same pattern. It should be noted that projections for Bow East ward do not include projected housing growth in the area covered by the London Legacy Development Corporation. Therefore, the projected population illustrated below is likely to increase in this ward as well. In addition, due to changes to ward boundaries, data for Island Gardens ward is likely to be over-projecting population growth and open space deficiency levels are in reality likely to remain low.

Figure 47: Population projections by wards¹⁹

¹⁹ Projections were produced using the Local Plan development trajectory and the GLA's online projection model, Witan.

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There is no up to date data and information on the resident composition for the new housing development.²⁰ It is therefore not possible to consider how current open space usage by different groups might influence usage patterns in the future as the population changes as well as grows.

Map 11 indicates five minutes walking distance (400m) from all parks above 2 ha in Tower Hamlets. The map shows that the area where a park over 2 ha is located within 400m is fairly limited. The areas that are beyond five minutes distance from parks above 2ha are found in the following localities. Areas shown in bold are expected to see particular high levels of population growth. Smaller parks and open spaces in these wards may have more users too. It is expected that more people in these areas, in particular, need to travel far to access parks over 2ha, unless additional open space between 1ha and 2ha is created.

²⁰ For example, it has been reported that there are many 'buy to leave' (purchase a property, but no one reside) properties in London. See <https://www.ft.com/content/6954f798-cb2c-11e5-a8ef-ea66e967dd44>

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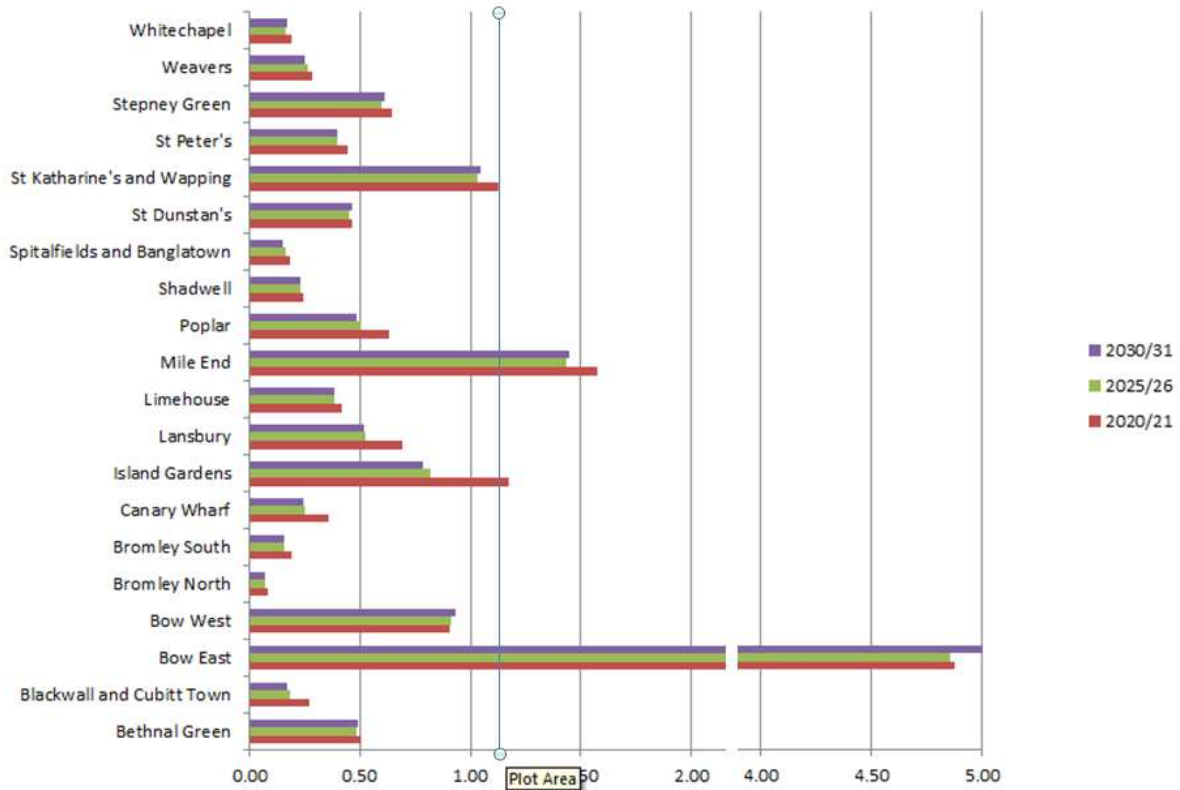
- **Whitechapel**
- Aldgate
- Shadwell
- Shoreditch/Spitalfields
- North Bethnal Green
- **Fish Island**
- Bow
- **Bromley-by-Bow**
- **Poplar Riverside**
- **North and South-West of the Isle of Dogs.**

Map 12 shows 15 minutes walking distance (1.2km) from major marks. It highlights that the west of the borough, including the Whitechapel ward, and large parts of the Blackwall and Cubitt Town and Canary Wharf wards are beyond 15 minutes walking distance from major marks. This also indicates increased strain on the smaller parks and open spaces in these wards.

There is also a possibility that residents are willing to travel more than 5 minutes or 15 minutes to access parks and open spaces using improved transport links, including the bike-sharing scheme and it is impossible to anticipate exact needs for parks in each ward.

Some areas will experience higher levels of population growth than others, many of which already have insufficient access to open space. The graph below shows the current and projected levels of open space deficiency today, in 2020/21, 2025/26 and 2030/31.

Figure 48: Projected levels of open space deficiency by ward



The Tower Hamlets quantity standard for access to open spaces is 1.2 ha/ 1000 people. Wards that are projected to be above this threshold are – for the purpose of this strategy – defined as having ‘no deficiency’ in quantitative terms but may still include areas that are outside catchment areas of an open space. Degrees of future deficiency will vary across the wards and are categorised as follows:

- High level of deficiency between ≤ 0.5 ha/ 1,000 residents
- Moderate level of deficiency between >0.5 ha and ≤ 1 ha/ 1,000 residents
- Low level of deficiency between > 1 ha and ≥ 1.2 ha / 1,000 residents

Priority locations for securing new publicly accessible open space (strategic new open space)

Given the density of the borough and the proposed level of development, there is limited scope to create new publicly accessible open space through direct council delivery. As a consequence, the council will seek new open space through the planning process.

Based on the quantitative projections above together with an analysis of catchment areas and lines of severance, the following table provides an overview of all wards in the borough, their projected level of open space deficiency and proposed measures to mitigate the situation.

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Specifically, the mitigation distinguishes between (a) areas of search for new strategic open space (1ha and above) in the wards of highest need and (b) wider measures to provide a well-connected network of smaller open spaces across the borough. Areas of search for new strategic open space will inform the site allocations element of the emerging Local Plan.

It is expected that new publicly accessible open space will be owned and maintained by the respective land owners, with public access to the space secured through legal agreements as part of the planning process. Such an approach will secure new publicly accessible open space whilst recognising the council's financial position in years to come. Legal agreements will be required to secure the widest possible access to these new spaces.

Figure 49: Projected open space deficiency, catchment areas and proposed measures (by ward)

Ward	Projected open space issues			Strategic response				Delivery mechanism
	Projected deficiency in 2031 (ha per 1,000 people)	Catchment for access to Local Parks as per London Plan	Very strong lines of severance	Proposed typology of new space	Rationale & purpose	Location within ward	Other measures to provide accessibility to open space	
Whitechapel	High	Mostly out of catchment area	No	<p>Pocket park through Green Grid Strategy</p> <p>Green spine as part of Whitechapel Vision</p>	Provide connectivity to existing spaces, limited ability to create new space within development sites	<p>Along Green Grid</p> <p>Along green spine identified in Whitechapel Vision</p>	Improved connectivity to existing sites	<p>Green Grid Strategy</p> <p>Whitechapel Vision</p>
Weavers	High	Mostly out of catchment area	No	Tower Hamlets Local Park	Provide active recreation space on border of Spitalfields & Banglatown to	Bishops Gate Goodsyard to provide coverage for Spitalfields & Banglatown and	Improved connectivity to existing sites	Local Plan Site Allocation

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Ward	Projected open space issues			Strategic response				Delivery mechanism
	Projected deficiency in 2031 (ha per 1,000 people)	Catchment for access to Local Parks as per London Plan	Very strong lines of severance	Proposed typology of new space	Rationale & purpose	Location within ward	Other measures to provide accessibility to open space	
					overcome lack of access for both Places	Weavers		
Stepney Green	Moderate	Mostly within catchment area	No	Pocket park through Green Grid Strategy	Provide connectivity to existing spaces, limited ability to create new space within development sites	Along Green Grid	Improved connectivity to existing sites	Green Grid Strategy
St Peter's	High	Northern half of ward out of catchment area	Yes	Tower Hamlets Local Park	Provide active recreation space for residents limited by strong lines of severance	Oval and Marian Place Gasworks site	Improved connectivity to existing sites	Local Plan Site Allocation
St Katharine's & Wapping	Low	Southwest of ward out of catchment area	Yes	Pocket park through Green Grid Strategy	Provide connectivity to existing spaces, limited ability to create new space within development sites with the exception	Along Green Grid	Improved connectivity to existing sites	Green Grid Strategy

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Ward	Projected open space issues			Strategic response				Delivery mechanism	
	Projected deficiency in 2031 (ha per 1,000 people)	Catchment for access to Local Parks as per London Plan	Very strong lines of severance	Proposed typology of new space	Rationale & purpose	Location within ward	Other measures to provide accessibility to open space		
Page 532					of new pocket parks within London Dock site.				
	Dunstan's	High	Mostly within catchment area	No	Pocket park through Green Grid Strategy	Provide connectivity to existing spaces, limited ability to create new space within development sites.	Along Green Grid	Improved connectivity to existing sites	Green Grid Strategy
	Spitalfields & Banglatown	High	South and west of ward out of catchment area	No	Pocket park through Green Grid Strategy	Provide connectivity to existing spaces, limited ability to create new space within development sites.	Along Green Grid	Improved connectivity to existing sites	Green Grid Strategy
	Shadwell	High	North of ward out of catchment area	Yes	Pocket park through Green Grid Strategy	Provide connectivity to existing spaces, limited ability to	Along Green Grid	Improved connectivity to existing sites	Green Grid Strategy

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Ward	Projected open space issues			Strategic response				Delivery mechanism
	Projected deficiency in 2031 (ha per 1,000 people)	Catchment for access to Local Parks as per London Plan	Very strong lines of severance	Proposed typology of new space	Rationale & purpose	Location within ward	Other measures to provide accessibility to open space	
					create new space within development sites.			
Poplar Page 533	High	Western and eastern edge of ward out of catchment area	Yes	Pocket park through Green Grid Strategy Tower Hamlets Local Park	Provide connectivity to existing spaces, limited ability to create new space within development sites. Provide active recreation space for residents limited by strong lines of severance	Along Green Grid As part of Robin Hood Gardens/ Blackwall Reach regeneration project	Improved connectivity to existing sites	Green Grid Strategy Local Plan Site Allocation
Mile End	No deficiency	Fully within catchment area	Yes	Pocket park through Green Grid Strategy	Provide connectivity to existing spaces, limited ability to create new space	Along Green Grid	Improved connectivity to existing sites	Green Grid Strategy

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Ward	Projected open space issues			Strategic response				Delivery mechanism
	Projected deficiency in 2031 (ha per 1,000 people)	Catchment for access to Local Parks as per London Plan	Very strong lines of severance	Proposed typology of new space	Rationale & purpose	Location within ward	Other measures to provide accessibility to open space	
Page 534 Pomehouse					within development sites.			
	High	Mostly within catchment area	Yes	Pocket park through Green Grid Strategy	Provide connectivity to existing spaces, limited ability to create new space within development sites.	Along Green Grid	Improved connectivity to existing sites	Green Grid Strategy
Lansbury	Moderate	Area to the east of the A12 out of catchment area	Yes	Tower Hamlets Local Park	Provide active recreation space for significant new community east of A12	Leven Road gasholder site to provide best coverage for existing and new communities east of the A12 and north of the A13	Improved connectivity north-south as part of the Lea River Park	Local Plan Site Allocation
Island	Low ²¹	West of the	Yes	Pocket park	Provide	Along Green Grid	Improved	Green Grid

²¹ Due to changes to ward boundaries, population information for Island Gardens ward is likely to be over-projecting population growth and open space deficiency levels are likely to remain low.

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Ward	Projected open space issues			Strategic response				Delivery mechanism
	Projected deficiency in 2031 (ha per 1,000 people)	Catchment for access to Local Parks as per London Plan	Very strong lines of severance	Proposed typology of new space	Rationale & purpose	Location within ward	Other measures to provide accessibility to open space	
Gardens		ward out of catchment area		through Green Grid Strategy	connectivity to existing spaces, limited ability to create new space within development sites.		connectivity to existing sites	Strategy
Canary Wharf	High	Northwest, central area along Marshwall and southeast out of catchment area. However, northwest is largely commercial.	Yes	Tower Hamlets Local Park	Provide active recreation space for significant new communities on a site with strong lines of severance.	Tower Hamlets Local Park at Aspen Way site to provide catchment in Canary Wharf ward as well as Blackwall & Cubitt Town ward.	Improved connectivity to existing sites in line with emerging Isle of Dogs Opportunity Area Planning Framework.	Local Plan Site Allocation
				Small open space x 1		Small open space at Westferry Printworks site.		Local Plan Site Allocation
Bromley South	High	Mostly out of catchment	Yes	Tower Hamlets Local Park	Provide active recreation space for significant new	On the eastern perimeter of the Bow Common	Improved connectivity to existing	Local Plan Site Allocation

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Ward	Projected open space issues			Strategic response				Delivery mechanism
	Projected deficiency in 2031 (ha per 1,000 people)	Catchment for access to Local Parks as per London Plan	Very strong lines of severance	Proposed typology of new space	Rationale & purpose	Location within ward	Other measures to provide accessibility to open space	
Page 535 Somley North		area			communities on a site with strong lines of severance.	Lane gasworks site to provide access for communities in the east of the ward	sites across the A12 and into the Lea River Park.	
	High	Western and parts of eastern areas of the ward are within catchment area.	Yes	Pocket park through LLDC Local Plan	Provide connectivity to existing spaces, limited ability to create new space within development sites.		Improved connectivity to existing sites to the east of the River Lea through new bridges.	LLDC Local Plan
Bow West	Moderate	South-eastern area of the ward is out of catchment area.	Yes	Pocket park through Green Grid Strategy	Provide connectivity to existing spaces, limited ability to create new space within development sites.	Along Green Grid	improved connectivity to existing sites	Green Grid Strategy

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Ward	Projected open space issues			Strategic response				Delivery mechanism
	Projected deficiency in 2031 (ha per 1,000 people)	Catchment for access to Local Parks as per London Plan	Very strong lines of severance	Proposed typology of new space	Rationale & purpose	Location within ward	Other measures to provide accessibility to open space	
Bow East	No deficiency	Eastern area and part of the southern areas is out of catchment area.	Yes	Small open space Pocket park through Green Grid Strategy	Provide active recreation space for significant new communities on a site with strong lines of severance. Provide connectivity to existing spaces, limited ability to create new space within development sites.	Fish Island West of the A12	Improved connectivity to existing sites though additional bridges into Queen Elizabeth Olympic Park	LLDC Local Plan Green Grid Strategy
Blackwall and Cubitt Town	High	Mostly outside catchment area	Yes	2 x Tower Hamlets Local Park	Provide active recreation space for significant new communities on a site with strong	Tower Hamlets Local Park on eastern end of Wood Wharf site.	Improved connectivity to existing sites in line with	Local Plan Site Allocation

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Ward	Projected open space issues			Strategic response				Delivery mechanism
	Projected deficiency in 2031 (ha per 1,000 people)	Catchment for access to Local Parks as per London Plan	Very strong lines of severance	Proposed typology of new space	Rationale & purpose	Location within ward	Other measures to provide accessibility to open space	
Page 538				Pocket park through Green Grid Strategy	lines of severance.	Tower Hamlets Local Park near junction of Marshwall and Limeharbour to ensure maximum catchment for area east of the dock. London City Island site	emerging Isle of Dogs Opportunity Area Planning Framework.	Green Grid Strategy
Bethnal Green	High	Area north of A11is outside catchment area.	No	Pocket park through Green Grid Strategy	Provide connectivity to existing spaces, limited ability to create new space within development sites.	Along Green Grid	Improved connectivity to existing sites	Green Grid Strategy

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Future qualitative demand for new publicly accessible open space

New open space will need to be able to meet the demands from a rapidly growing population in a high density urban environment. In the context of an inner London borough as Tower Hamlets, the pressure on land is very high and securing new open space will need to be considered alongside securing other essential infrastructure such as schools or health facilities. The sites and locations identified in the table above have informed the site allocations process in the Local Plan. They provide some mitigation in quantitative terms and ensure that areas which are outside the catchment area of larger parks are considered as a priority for new publicly accessible open space.

As the population rises, these new spaces will need to function more effectively in order to address the needs of people living in a high density area. Levels of physical activity in Tower Hamlets remain comparatively low and some of the areas of greatest open space deficiency (especially in the east of the borough) also have the lowest levels of physical activity.

New open space will need to support physical activity and active play whilst also addressing issues around flood mitigation and air pollution. The design of publicly accessible areas of open space secured through the planning process has tended to focus on piazzas, squares and other spaces that are less likely to encourage active recreation and play. The new Local Plan therefore contains high level principles for the design of on-site publicly accessible open space with a strong emphasis on soft landscaped spaces that encourage play, physical activity and interaction. Specifically, the Local Plan should consider requiring that new on-site publicly accessible open space should:

- a. be of a high quality and provide facilities to promote active recreation and healthy lifestyles;
- b. be well-connected to other open spaces in accordance with the Council's Green Grid Strategy and Open Space Strategy; and
- c. enhance biodiversity, contributing to the objectives identified in the Council's Local Biodiversity Action Plan.

Future demand for playing pitches and outdoor sports facilities

The tables and narrative below provide a detailed breakdown of the anticipated demand for playing pitches and outdoor sports facilities based on projected population growth, using demand modelling tools and guidance developed by Sport England and national governing bodies for specific sports.

Based on population growth, existing shortages of pitches and outdoor sports facilities will continue to grow and new shortages will arise if the current amount of provision remains the same and use is not intensified whilst being managed to maintain quality.

There is limited scope to provide additional playing pitches and outdoor sports facilities and it will be important to protect existing provision through effective Local Plan policies.

Football

Figure 50: Future demand for adult 11 v 11 in MES

Analysis area	Current total demand 2017	Projected total demand 2021	Projected total demand 2026	Projected total demand 2031
City Fringe	(-1)	6.5	5.5	4.5
Isle of Dogs	2			
Lower Lea Valley	10.5			
Rest of Borough	1			
Total	12.5	19	18	17

The current adult shortfall totalling 12.5 MES is projected to rise to 19 MES in 2021 before falling slightly to 17 MES in 2031. This equates to nine pitches at standard quality, which would provide 18 MES. Consideration could be given to the conversion of some existing grass pitch capacity to artificial grass pitches. It may also be appropriate to ensure that pitch provision is taken into account when re-designing and masterplanning existing larger open spaces in the borough.

Figure 51: Future demand for youth 11 v 11 in MES

Analysis area	Current total demand 2017	Projected total demand 2021	Projected total demand 2026	Projected total demand 2031
City Fringe	-	8.5	11.5	10
Isle of Dogs	0.5			
Lower Lea Valley	-			
Rest of Borough	-			
Total	0.5	9	12	10.5

The current youth 11 v 11 shortfall totalling 0.5 MES is projected to rise to 9 MES in 2021 before rising to 10.5 MES in 2031. This equates to five standard quality pitches. This shortfall could be addressed in part by improving the quality of existing 11 v 11 youth pitches. In addition, the same considerations as for adult 11 v 11 pitches could be considered.

Figure 52: Future demand for youth 9 v 9 in MES

Analysis area	Current total demand 2017	Projected total demand 2021	Projected total demand 2026	Projected total demand 2031
City Fringe	(0.5)	3.5	4	4
Isle of Dogs	1			
Lower Lea Valley	1			
Rest of Borough	-			
Total	1.5	5	5.5	5.5

The current youth 9 v 9 shortfall totalling 1.5 MES is expected to rise to 5 MES in 2021 and 5.5 MES in 2031. Half of this shortfall could be met by improving the quality of existing pitches. In addition, the same considerations as for adult 9 v 9 pitches could be considered.

Figure 53: Future demand for mini 7 v 7 in MES

Analysis area	Current total demand 2017	Projected total demand 2021	Projected total demand 2026	Projected total demand 2031
City Fringe	-	1.5	1.5	2
Isle of Dogs	-			
Lower Lea Valley	-			
Rest of Borough	-			
Total	-	1.5	1.5	2

While there is no current shortfall for Mini 7 v 7 pitches, projections indicate a shortfall of 2 MES by 2031. This shortfall could be addressed by improving the quality of the existing Mini 7 v 7 pitch so it can accommodate the additional demand.

Figure 54: Future demand for mini 5 v 5 in MES

Analysis area	Current total demand 2017	Projected total demand 2021	Projected total demand 2026	Projected total demand 2031
City Fringe	-	4.5	5	5
Isle of Dogs	-			
Lower Lea Valley	-			
Rest of Borough	-			
Total	-	4.5	5	5

While there is no current shortfall for Mini 5 v 5 pitches, projections indicate a shortfall of 5 MES by 2031. Some of this shortfall could be addressed by improving the quality of the existing Mini 5 v 5 pitch so it can accommodate additional play. In addition, it may be appropriate to consider the provision of a further Mini 5 v 5 pitch at an existing site. The relatively small size of such a pitch may make this a viable option to be considered when re-designing sites.

Third Generation Artificial Grass Pitches (3G)

The Football Association training model has indicated that there is a current shortfall of one additional full sized FIFA certified 3G pitch to accommodate training demand. Team numbers are expected to rise from 110 teams in 2016 to 128 teams by 2031. As the current shortfall of one pitch assumes that some training can take place on smaller pitches, use of these smaller pitches is also expected to increase meaning that the shortfall of full sized 3G pitches may increase to two by 2013. As outlined above in relation to grass pitches, it may be appropriate to consider the conversion of some grass pitch capacity to 3G in order to provide additional training capacity and reducing pressure on the remaining grass pitches from training use. Importantly, consideration should be given to 3G surface types that can cater for the widest variety of sport at competitive level (i.e. football and rugby). The conversion of existing sand based artificial pitches should be

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avoided as they are required to meet demand for hockey, which cannot be played on 3G surfaces.

Cricket

Figure 55: Future demand for cricket in match sessions

Analysis area	Current total demand 2017	Projected total demand 2021	Projected total demand 2026	Projected total demand 2031
City Fringe	-	66	66	88
Isle of Dogs	10			
Lower Lea Valley	-			
Rest of Borough	108			
Total	128	194	194	216

The current shortfall totalling 128 sessions on NTPs is expected to rise to 216 sessions by 2031 based on an additional projected 8 teams requiring 11 sessions each. This indicates a projected shortfall of three to four NTPs by 2031. It may be appropriate to consider potential locations for additional NTPs as part of the re-design of sites. However, given the size requirements for cricket and the small number of larger open spaces in Tower Hamlets, this may prove particularly challenging.

Rugby

Figure 56: Future demand for rugby union in MES

Analysis area	Current total demand 2017	Projected total demand 2021	Projected total demand 2026	Projected total demand 2031
City Fringe	-	0.25	0.5	0.5
Isle of Dogs	7.5			
Lower Lea Valley	-			
Rest of Borough	-			
Total	7.5	7.75	8	8

The current shortfall totalling 7.5 MES is expected to remain stable and only rise marginally to 8 MES by 2031. This equates to three pitches, assuming a standard level of quality combined with drainage system. It may be appropriate to consider the conversion of some grass pitch capacity to 3G as set out above in the section dedicated to 3G pitches.

Hockey

Figure 57: Future demand for hockey in MES

Analysis area	Current total demand 2017	Projected total demand 2021	Projected total demand 2026	Projected total demand 2031
City Fringe	13	3	3.5	3.5
Isle of Dogs				
Lower Lea Valley				
Rest of Borough				
Total	13	16	16.5	16.5

The current shortfall of 13 MES, is expected to increase to 16.5 MES by 2031 assuming that projected additional teams require 0.5 MES per week. This equates to two hockey suitable artificial grass pitches. Some of this shortfall could be addressed by significantly improving access to St Paul’s Way School on weekend for match play.

Given the current shortfall of hockey suitable pitches to accommodate current and future hockey demand, all three full sized sand based pitches should be protected and retained as hockey suitable surfaces as conversion of one or more to 3G would have a detrimental impact on hockey in the borough.

Tennis

Tennis court provision currently exceeds demand and has spare capacity at present. Should demand increase such that additional capacity beyond that already planned as part of the redevelopment of King Edward VII Memorial Park is required, consideration should primarily be given to improving access to the substantial number of courts currently not available for community use.

Bowls

All three bowling greens have current substantial spare capacity. Given the national trend of declining participation in bowling alongside the demographic makeup of the population, there is no expected future shortfall. Based on Bowls England’s guidance on the sustainability of bowling greens when membership falls below certain levels, it may be appropriate to consider reconfiguring existing provision in order to improve sustainability and free up limited open space land for other outdoor sports uses with rapidly rising demand.

Athletics

It is likely that demand for use of athletics tracks may increase in the future, either through an increase in participation at athletics clubs or a continued increase in the number of increasingly popular running clubs and groups which may seek track time for more structured sessions. However, based on current usage levels and UK Athletics’ strategy, it is expected that current capacity at Mile End Park Leisure Centre and Stadium is sufficient

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to meet future demand. The track should therefore be retained and protected, with priority focused on ensuring that quality is sustained and improved to continue accommodating demand.

PART C: NEW APPROACHES TO IMPROVING EXISTING OPEN SPACE

4.5 THE NEED FOR NEW APPROACHES

Periods of rapid change and financial restraints, such as now, present challenges as well as opportunities. A good starting point for understanding the implications of the analysis above is to recognise the strong foundations on which the council can shape future open space priorities. The residents of Tower Hamlets overwhelmingly appreciate their open spaces. They are used for a multitude of activities such as socialisation, family time, active recreation and cultural events – all activities that contribute to healthy and productive communities.

Pressure for more residential development continues to be high and there is limited scope to provide new open space in the borough. Therefore, in addition to securing new open space through the planning process, it becomes increasingly important to make sure that existing spaces can accommodate increased usage and investment is targeted to achieve the greatest impact.

4.6 PRIORITISING RESOURCES

As outlined in Part D of Chapter 2, the quality and value of open space varies across the borough. Value, in simple terms, refers to how much there is to do at a site, i.e. the variety of activities a site supports through its design and facilities.

Quality, in simple terms, refers to the how good the facilities and design are. If a site has a high value score but a lower quality score, the site already has the capability to support a wide variety of activities but could work better with investment to improve the quality. If a site has a lower value score, it is likely to be more expensive to increase the score as entirely new facilities would need to be created. It may also not always be appropriate or possible to provide additional facilities. For example, a site may be very small, or have historic or biodiversity value.

Resources for capital investment in parks and open spaces will continue to be limited and it will be important to invest strategically to achieve the greatest level of return on investment from available resource.

The Strategy is therefore setting high level principles for making future investment decisions. These principles will need to be developed into a more prioritisation process.

The following principles should be applied in sequence as a two stage process to prioritise investment in open spaces in Tower Hamlets. The principles associated with the first stage are designed to focus investment on areas of greatest need in the borough. The principles associated with the second stage are designed to select specific sites for investment within the areas identified at the first stage.

However, the principles can be used separately where it is not possible to apply both stages. For example, in cases where investment is already earmarked for a specific area, only the site test may be relevant. This could apply if legal agreements associated with

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developer contributions restrict expenditure to certain locations or if a masterplan requires specific infrastructure.

The principles cannot be applied in isolation and all investment decisions, whilst driven by the principles, will also need to consider the wider context of investment. It may, for example, be necessary to invest in a site which does not meet all the criteria but which may offer significant revenue savings from capital investment. Similarly, it may be beneficial for the council to invest in a site if doing so levers significant external investment into the site.

Stage 1: Identifying areas of the borough which would benefit from investment in open space	
<i>Principle</i>	<i>Rationale</i>
1a. Does the area have poor access to open space, specifically, is pedestrian access to open spaces poor? (catchment)	In a dense urban setting like Tower Hamlets small areas of open space play an important role in providing access to open space. Tackling poor access (through investment in smaller sites to provide high quality neighbourhood sites and through investment in connectivity) will need to take place alongside efforts to secure new space in areas of deficiency. Part B of Chapter 4 identifies the areas that have poor catchment area coverage.
1b. Is the area projected to have high population growth resulting in a high level of quantitative open space deficiency?	If the population in areas of existing deficiency is expected to grow, it is reasonable to expect that more people will require open space. The impact of the existing deficiency is therefore likely to worsen and be felt by more people in areas of high growth, compared to an area of deficiency without high growth. Part B of Chapter 4 identifies the areas that are projected to have the highest level of open space deficiency due to increased population growth.
1c. Is the area considered to be in the most deprived in the borough and have low levels of physical activity?	The impact of open space deficiency and population growth will be acutely felt in areas with deprivation where it is reasonable to expect that more people rely on publicly accessible open space for physical activity and play. This is underpinned by findings of the engagement survey carried out as part of the research underpinning the Strategy. Furthermore, more

	deprived areas also overlap significantly with area of low levels of physical activity as measured by Sport England. The latest of the regularly updated Indices of Multiple Deprivation and Sport England physical activity level mapping should be used.
Stage 2: Identifying specific sites in the borough which would benefit from investment	
2a. Is the site of lower quality, but already supporting a range of activities (i.e. higher value)?	It is reasonable to assume that sites that have a range of functions appeal to a wider range of residents; by virtue of the fact they have more on offer. Increasing the quality of those sites could drive up the number of users, and crucially, increase the number of users across a diverse range of residents due to the broad appeal of the space.
2b. Is the site of lower value, but with the potential to offer a wider range of functions? Sites meeting 2a should be prioritised over 2b.	As demand for open space grows doing more with existing sites so they cater for as wide range of residents as possible will be crucial. Hence resources should go towards diversifying what is on offer, where diversification is an option.

4.7 DESIGNING FOR GROWTH

With limited scope to create new publicly accessible open space, existing spaces will need to become more resilient to increased usage and offer more to more people with different interests. This requires a rethink in the way publicly accessible open space is designed in a high density inner city location. Being more creative about how open space is used, connected and enhanced can help to ensure that growing demand can be accommodated. Increasing the value of smaller sites by making them more flexible and varied can be especially beneficial in areas of high demand. However, such smaller sites can also suffer from possible overuse that can be mitigated to an extent through different approaches to design.

Sites in areas of deficiency also have an important role as habitats. As human pressure and adverse consequences from climate change affect open space, it is essential to protect habitats and habitat linkages. Opportunities should be sought to increase the nature conservation values of open spaces.



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Open space can enhance soundscapes and provide refuge from busy and noisy streets, especially if the site is protected by vegetation.




Selective planting of vegetation can also contribute to absorb air pollution and help manage the visual impact of traffic.

These competing factors make designing open space improvements in an area like Tower Hamlets a particular challenge. The council should therefore develop new design guidance for its spaces which seeks to balance the needs of a growing population with diverse demands with the need for open space to contribute positively to biodiversity and environmental mitigation.


CHAPTER 5: ACTION PLAN

Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
 Page 550	Managing the impact of population growth on the provision of open spaces	Inform Local Plan site allocations to ensure sites are identified to bring forward new strategic open space of 1 ha and over which can cater for a range of uses including physical activity.	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open space • Protect – protecting and safeguarding all existing open space such that there is no net loss 	<ul style="list-style-type: none"> • Local Plan reflects deficiency and protects existing open spaces • Local Plan policies set principles for the design of on-site publicly accessible open space, to ensure it supports physical activity, including inclusive play, and healthy lifestyles. • New open spaces are secured on sites as identified in the Local Plan and Open Space Strategy. 	Short term: 2017 – 2018 Short term: 2017 - 2018 Medium term: 2019 – 2022 to Long term: 2023 - 2027
	Managing the impact of population growth on the provision of open spaces	Inform Local Plan policies to ensure existing playing field sites are protected.	<ul style="list-style-type: none"> • Protect – protecting and safeguarding all existing open space such that there is no net loss 	<ul style="list-style-type: none"> • Local Plan reflects deficiency and protects existing playing fields and playing pitches 	Short term: 2017 – 2018

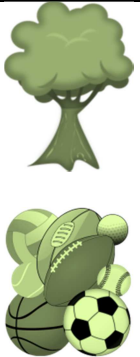
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Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
 	<p>Contributing to sustainable development</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Ensure the Local Plan requires certain new developments to have health impact assessments as part of the planning application process.</p>	<p>Enhance – improving quality, usability and accessibility of existing publicly accessible open space</p>	<ul style="list-style-type: none"> • Tower Hamlets Local Plan sets out health impact assessment requirements for developers in regard to access and use of open space. • Health impact assessments are in place for developments that require them. 	<p>Short term: 2017 - 2018</p> <p>Ongoing</p>
	<p>Contributing to sustainable development</p>	<p>Secure access to open space within new developments in perpetuity through the use of legal agreements as part of the planning permission process.</p>	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open space • Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> • Legal agreements are robust and contain measures to ensure that public access to on-site open space is maintained in perpetuity. • Robust enforcement action is taken if access to land is restricted to the public beyond limitations agreed as part of the legal agreement. 	<p>Short term: 2017 - 2018</p> <p>Ongoing</p>



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Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
 Page 552	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Ensure that parks and open space investment need, as identified in this strategy, is considered alongside other infrastructure requirements as part of the Council Infrastructure Delivery Plan and Capital Strategy.</p>	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open space • Enhance – improving quality, usability and accessibility of existing publicly accessible open space • Connect – creating new green corridors and enhancing existing ones to connect publicly accessible open spaces to main destination points 	<ul style="list-style-type: none"> • Open space investment need is included in the Infrastructure Delivery Framework and updated regularly. • Infrastructure Delivery Framework and Capital Strategy underpin decision-making about infrastructure investment. 	<p>Short term: 2017 - 2018</p> <p>Ongoing</p>



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Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
 Page 553	Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets	Implement an investment prioritisation framework for parks and open spaces, including playing pitches, to ensure that investment is made in areas of need and achieves the greatest level of impact.	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open space • Enhance – improving quality, usability and accessibility of existing publicly accessible open space • Connect – creating new green corridors and enhancing existing ones to connect publicly accessible open spaces to main destination points 	<ul style="list-style-type: none"> • A detailed prioritisation process based on the principles set out in the strategy is in place. • Use of investment prioritisation process is evidenced in decisions made and outcomes achieved. • Delivery of improvements is planned annually alongside the budget setting process. • A cyclical programme of reviews of sites and condition of assets is in place. 	Short term: 2017 - 2018 Ongoing Ongoing Ongoing



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Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
 Managing the impact of population growth on the provision of open spaces Page 554	Managing the impact of population growth on the provision of open spaces	Ensure improvements to existing open spaces and highways consider the findings of the Green Grid Strategy to maximise access to open space.	<ul style="list-style-type: none"> • Enhance – improving quality, usability and accessibility of existing publicly accessible open space • Connect – creating new green corridors and enhancing existing ones to connect publicly accessible open spaces to main destination points 	<ul style="list-style-type: none"> • Green Grid Strategy update focuses on deliverability of projects • Green Grid implementation governance brings together key delivery services to enable integrated and joined up working 	Short term: 2017 – 2018 Short term: 2017 - 2018
	Managing the impact of population growth on the provision of open spaces Contributing to sustainable development	Develop new design guidance for council open space to ensure spaces can be more resilient when experiencing increased use whilst helping to mitigate climate change and air pollution and support physical activity.	<ul style="list-style-type: none"> • Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> • New inclusive design guidance sets out how resilience of parks and open space can be improved and how they can contribute to mitigating climate change and air pollution as well as support physical activity. 	Short term: 2017 - 2018



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Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p>	<p>Ensure that detailed design development priorities for open space sites consider playing pitches and ancillary facilities</p>	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open spaces • Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces • Protect – protecting and safeguarding all existing open space such that there is no net loss 	<ul style="list-style-type: none"> • Supply, demand and quality of playing pitches is considered when open spaces are developed or re-developed • Playing pitch considerations are incorporated in new open space design to be developed 	<p>Ongoing</p> <p>Short term: 2017 - 2018</p>
	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Review all existing grass pitch locations to determine the extent to which these could be converted to 3G, ensuring that conversion does not result in loss for sports requiring specific surface types.</p>	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open spaces • Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> • Grass pitch sites are identified for potential conversion to 3G 	<p>Medium term: 2019 - 2022</p>




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Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
 Page 550 	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Review all artificial pitch locations to determine the extent to which these could be upgraded, ensuring that conversion does not result in loss for sports requiring specific surface types.</p>	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open spaces • Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> • Sites for potential upgrade are identified 	<p>Medium term: 2019 - 2022</p>
	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Continue to promote the use of innovative ways of providing access to artificial pitches, including on the roofs of new developments</p>	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open spaces 	<ul style="list-style-type: none"> • Local Plan promotes innovative approaches to provision of outdoor sports facilities • Development incorporates rooftop pitch provision 	<p>Short term: 2017 – 2018</p> <p>Ongoing</p>



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Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Work with the Football Association to review all grass pitch locations and determine the extent to which the use of fibre injections or other similar systems may improve the quality of existing pitches and consider application to the Pitch Improvement Programme fund</p>	<ul style="list-style-type: none"> Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> Sites for potential improvement are identified 	<p>Short term: 2017 -2018</p>
	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Consider the reuse of sections of replaced AGP carpets for patching together into smaller MUGA sized AGPs on housing estates</p>	<ul style="list-style-type: none"> Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> Quality of sections of carpets assessed for reuse prior to replacement of carpets 	<p>Ongoing</p>


PARKS AND OPEN SPACE STRATEGY 2017 - 2027

Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Work with national and regional cricket governing bodies to feed into the wider regional development strategy for cricket</p>	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open spaces • Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> • Local cricket picture is reflected and considered in the regional strategy 	<p>Ongoing</p>
	<p>Managing the impact of population growth on the provision of open spaces</p>	<p>Investigate the option of meeting demand for cricket through non-traditional formats (e.g. cage cricket on housing estates)</p>	<ul style="list-style-type: none"> • Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> • Options for non-traditional formats developed 	<p>Medium-term: 2019 - 2022</p>
	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Work with national and regional cricket governing bodies to develop a business plan for a fine turf pitch, including an assessment of financial and operational viability of a placing a pitch in a publicly accessible open space</p>	<ul style="list-style-type: none"> • Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> • Business plan and financial/operational viability considerations completed 	<p>Short term: 2017 - 2018</p>



PARKS AND OPEN SPACE STRATEGY 2017 - 2027

Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p> <p>Managing the impact of population growth on the provision of open spaces</p>	<p>Review the condition of existing tennis courts and bowling greens to determine the extent to which upgrade is required</p>	<ul style="list-style-type: none"> • Create – maximising opportunities for new publicly accessible open spaces • Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> • Sites for potential upgrade are identified 	<p>Medium term: 2019 - 2022</p>
	<p>Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets</p>	<p>Update condition and suitability surveys of all changing facilities to inform future investment decisions</p>	<ul style="list-style-type: none"> • Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> • Investment prioritisation process is evidenced by completed surveys to guide decisions 	<p>Medium term: 2019 - 2022</p>




PARKS AND OPEN SPACE STRATEGY 2017 - 2027

Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
 Page 560	Mitigating the revenue costs for the council of providing parks and open spaces in Tower Hamlets	Improve management of the longer term costs of creation, management and maintenance of open spaces and parks.	<ul style="list-style-type: none"> • Protect – protecting and safeguarding all existing open space such that there is no net loss • Create – maximising opportunities for new publicly accessible open space • Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> • A whole life costing approach is taken to all capital investment in parks and open space. • New design guidance sets out how resilience of parks and open space can be improved. • Local Plan policies require the ongoing maintenance of new publicly accessible open space within developments to be borne by developers. 	Short term: 2017 – 2018 Short term: 2017 – 2018 Short term: 2017 – 2018



PARKS AND OPEN SPACE STRATEGY 2017 - 2027

Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
	Contributing to sustainable development	Assess the effectiveness of air quality mitigation measures in the area of the Millwall and Victoria Park permanent monitoring site.	<ul style="list-style-type: none"> Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> Continue to run the Millwall and Victoria Park permanent monitoring site (alongside the borough's other 3 sites) monitoring pollutants of concern to ensure air quality objectives are being met and to assess the effectiveness of local and regional policies. All pollution monitoring data is made available to the public and the website is kept up to date. 	<p>Ongoing</p> <p>Short term: 2017 - 2018</p>
	Addressing competing demands on parks and open spaces	Develop an approach to engage with communities about the issues that matter to them around the use of parks and open spaces in the borough and how they can be addressed.	<ul style="list-style-type: none"> Protect – protecting and safeguarding all existing open space such that there is no net loss Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	Formal engagement processes are set up to receive customer feedback.	Short term: 2017 - 2018




PARKS AND OPEN SPACE STRATEGY 2017 - 2027

Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
 Addressing competing demands on parks and open spaces Contributing to sustainable development	Work alongside the Active Travel Team to develop an effective approach to cycling in council open spaces.	<ul style="list-style-type: none"> Enhance – improving quality, usability and accessibility of existing publicly accessible open space Connect – creating new green corridors and enhancing existing ones to connect publicly accessible open spaces to main destination points 	Delivery of cycling initiatives in the borough which successfully meet the needs, and address the concerns, of those wishing to cycle in parks and other park users.	Ongoing	
 Addressing competing demands on parks and open spaces	Review the council approach to dogs in parks to ensure the needs of all park users are balanced.	<ul style="list-style-type: none"> Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> Review of existing approaches (borough wide and at specific sites) is concluded and options for balancing competing demands are considered by Members. 	Short term: 2017 - 2018	
 Mitigating the revenue costs for the council of providing parks and open spaces in Tower Hamlets	Carry out a review of all buildings in parks to ensure they are in line with the council's asset strategy.	<ul style="list-style-type: none"> Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> Review of existing tenancies and lettings concluded to establish if they meet the council's Best Value duty. 	Medium term: 2019 – 2022	

PARKS AND OPEN SPACE STRATEGY 2017 - 2027

Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
	Mitigating the revenue costs for the council of providing parks and open spaces in Tower Hamlets	Develop an effective approach to managing commercial activities in parks ensuring there are robust arrangements in place for licensing and payment and increased awareness of requirements amongst those affected. This includes festivals and events which are covered by an existing policy.	<ul style="list-style-type: none"> • Protect – protecting and safeguarding all existing open space such that there is no net loss • Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> • Develop a clear policy for charging for use of open space which considers the commercial nature of activities and the impact this may have on other users. 	Short term: 2017 - 2018
Page 563 	<p>Addressing competing demands on parks and open spaces</p> <p>Mitigating the revenue costs for the council of providing parks and open spaces in Tower Hamlets</p>	Review opportunities, and existing arrangements, for community management which maximise the potential benefits that such arrangements offer whilst ensuring that spaces remain accessible to all residents equally.	<ul style="list-style-type: none"> • Protect – protecting and safeguarding all existing open space such that there is no net loss • Create – maximising opportunities for new publicly accessible open space • Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> • Existing community management arrangements are consistent with the council's approach to community asset letting and grants. • Effective approach developed for co-production and community management for open spaces up to 1ha (meaning small open spaces and pocket parks as per the strategy classifications) 	<p>Medium term: 2019 – 2022</p> <p>Medium term: 2019 – 2022</p>

PARKS AND OPEN SPACE STRATEGY 2017 - 2027

Action focus	Aim	Activity	Local Plan Policy Principles	Success factor	Implementation phase
 Page 564	Addressing competing demands on parks and open spaces	Improve communication and engagement opportunities for residents around the use of, and all issues related to, parks and open spaces.	<ul style="list-style-type: none"> Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> Communications on local park improvements are targeted to residents within catchment areas to ensure that those most impacted can be heard. Events, activities and news about parks and open spaces are effectively embedded in the council's new communication tools. 	Ongoing Short term: 2017 – 2018
	Addressing competing demands on parks and open spaces	Produce a summary of the Open Space Strategy which highlights the council's vision for open space and outdoor sports facilities in the borough	<ul style="list-style-type: none"> Enhance – improving quality, usability and accessibility of existing publicly accessible open space 	<ul style="list-style-type: none"> Summary document completed and published 	Short term: 2017 – 2018
	Addressing competing demands on parks and open spaces	Work with schools to maximise community access to school pitch facilities	<ul style="list-style-type: none"> Enhance – improving quality, usability and accessibility of existing publicly accessible open spaces 	<ul style="list-style-type: none"> Access to school pitches is maximised 	Short term: 2017 - 2018

APPENDICES

SUPPORTING INFORMATION FOR CHAPTER 2

- 2.1 Open spaces in Tower Hamlets
- 2.2 Publicly accessible open spaces in Tower Hamlets
- 2.3 Quality and value ratings for audited open space sites

SUPPORTING INFORMATION FOR CHAPTER 3

- 3.1 Culture, leisure and open spaces telephone survey 2016 summary results

SUPPORTING INFORMATION FOR CHAPTER 2

2.1 Open spaces in Tower Hamlets

The table below lists the site names for open spaces in Tower Hamlets and categorises them according to their function and size.

SITE NAME	FORMER PPG 17 TYPOLOGY	LOCAL HIERARCHY
120-132 Chrisp Ctreet	Amenity green space	Linear open space
21 Wapping Lane	Amenity green space	Linear open space
22-28 Marsh Wall	Green corridors	Linear open space
25 Churchill Place	Amenity green space	Linear open space
303-305 Burdett Road	Amenity green space	Linear open space
Abbott Road Gardens	Amenity green space	Pocket park
Aberfeldy Millennium Green	Parks and gardens	Pocket park
Aberfeldy Playground	Provision for children and teenagers	Pocket park
Ackroyd Drive Allotments	Allotments, community gardens and city (urban farms)	Pocket park
Ackroyd Drive Open Space	Parks and gardens	Small open space
Albert Gardens	Parks and gardens	Pocket park
Aldgate Park, Braham St	Parks and gardens	Pocket park
All Saints Churchyard	Cemeteries and churchyards	Small open space
Allen Gardens	Parks and gardens	Tower Hamlets local park
Allen Gardens Play Area	Provision for children and teenagers	Pocket park
Altab Ali Park	Cemeteries and churchyards	Small open space
Alton Street Open Space	Parks and gardens	Small open space
Arbour Square Gardens	Parks and gardens	Pocket park

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Archibald Open Space	Parks and gardens	Pocket park
Bancroft Road Cemetery	Cemeteries and churchyards	Pocket park
Bancroft Road Nature Garden	Parks and gardens	Pocket park
Bartlett Park	Parks and gardens	Local park and open space
Baxendale Street Gardens	Parks and gardens	Pocket park
Beaumont Square Gardens	Parks and gardens	Small open space
Belgrave Open Space	Parks and gardens	Small open space
Bethnal Green Gardens	Parks and gardens	Local park and open space
Bigland Green Open Space	Provision for children and teenagers	Pocket park
Blackwall Basin and Poplar Dock	Civic spaces	Linear open space
Boundary Gardens (Arnold Circus)	Parks and gardens	Pocket park
Boundary Playground	Provision for children and teenagers	Pocket park
Bow Common Lane Gas Works	Parks and gardens	Small open space
Braithwaite Park	Parks and gardens	Small open space
Bromley Recreation Ground	Parks and gardens	Small open space
Burial Ground Alderney Road	Cemeteries and churchyards	Pocket park
Cable Street Allotments	Allotments, community gardens and city (urban farms)	Small open space
Cabot Square	Parks and gardens	Small open space
Caledonian Wharf	Green corridors	Linear open space
Canada Square	Parks and gardens	Small open space
Canary Riverside	Civic spaces	Pocket park
Carlton Square and Gardens	Parks and gardens	Pocket park
Carlton Square Extension	Parks and gardens	Small open space
Carron Continental Wharf	Green corridors	Linear open space
Caspian Wharf	Amenity green space	Pocket park

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Castle Wharf	Green corridors	Linear open space
Cavell Street Gardens	Parks and gardens	Pocket park
Cephas Street Square	Amenity green space	Pocket park
Chicksand Ghat	Provision for children and teenagers	Pocket park
Chiltern Green	Amenity green space	Pocket park
Chrisp Street Market Area 1	Civic spaces	Pocket park
Chrisp Street Market Area 2	Civic spaces	Small open space
Christchurch Gardens	Cemeteries and churchyards	Pocket park
Claredale Street / Sheldon Place	Amenity green space	Linear open space
Compass Point	Green corridors	Linear open space
Cotton Street/Bazely Street	Parks and gardens	Pocket park
Cubitt Town Junior and Infants School	Outdoor sports facilities	Small open space
Dockers Tanner Road	Parks and gardens	Pocket park
East India Dock Basin	Natural and semi natural urban green spaces	Local park and open space
East India Dock Square	Civic spaces	Small open space
Fern Street Open Space	Parks and gardens	Pocket park
Ford Square	Parks and gardens	Pocket park
Four Seasons Green	Parks and gardens	Pocket park
Furze Green Open Space	Parks and gardens	Small open space
Garrison Road/Legion Terrace	Amenity green space	Pocket park
George Green School	Outdoor sports facilities	Small open space
Gladstone Place	Amenity green space	Pocket park
Glamis Adventure Playground	Parks and gardens	Pocket park
Globe Road Open Space	Parks and gardens	Pocket park
Gosling Gardens	Parks and gardens	Pocket park

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Grand Union Canal/Regent's Canal	Civic spaces	Linear open space
Great Eastern Slipway	Civic spaces	Small open space
Grove Hall Park	Parks and gardens	Tower Hamlets local park
Harley Grove	Amenity green space	Pocket park
Harley Square	Amenity green space	Small open space
Hellings Street Play Area	Provision for children and teenagers	Pocket park
Hermitage Basin	Civic spaces	Linear open space
Hermitage Riverside Gardens	Parks and gardens	Pocket park
Hertford Union Canal	Civic spaces	Linear open space
Ion Square Gardens	Parks and gardens	Tower Hamlets local park
Island Gardens	Parks and gardens	Tower Hamlets local park
Isle of Dogs Wharves	Civic spaces	Linear open space
Jesus Green	Parks and gardens	Pocket park
Jewish Burial Ground Brady Street	Cemeteries and churchyards	Tower Hamlets local park
Johnson's Draw Dock	Green corridors	Linear open space
Jolly's Green	Parks and gardens	Small open space
Jubilee Gardens	Parks and gardens	Pocket park
Jubilee Park	Parks and gardens	Tower Hamlets local park
King Edward Memorial Park	Parks and gardens	Local park and open space
Kings Wharf	Parks and gardens	Pocket park
Langdon Park	Parks and gardens	Tower Hamlets local park
Langdon Park School	Outdoor sports facilities	Tower Hamlets local park
Leven Road Open Space	Parks and gardens	Small open space
Lighterman's Garden	Amenity green space	Small open space
Limehouse Basin	Civic spaces	Linear open space
Limehouse Cut	Civic spaces	Linear open space

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Limehouse Fields	Parks and gardens	Pocket park
London Wall Gardens	Parks and gardens	Pocket park
London Yard	Green corridors	Linear open space
Maconochies Wharf	Green corridors	Linear open space
Mallon Gardens	Parks and gardens	Pocket park
Mansford Street Open Space	Parks and gardens	Pocket park
Masthouse Terrace Play Area	Green corridors	Linear open space
Meath Gardens	Parks and gardens	Local park and open space
Meath Gardens Allotments	Allotments, community gardens and city (urban farms)	Pocket park
Mercers Burial Ground	Cemeteries and churchyards	Pocket park
Middleton Green	Parks and gardens	Small open space
Mile End Park	Parks and gardens	District park
Mile End Road Waste	Civic spaces	Pocket park
Millwall Dock	Civic spaces	Linear open space
Millwall Dock Open Space	Parks and gardens	Small open space
Millwall Outer Dock Slipway	Civic spaces	Pocket park
Millwall Park	Parks and gardens	District park
Ming Street Open Space	Amenity green space	Pocket park
Morpeth Secondary School	Outdoor sports facilities	Small open space
Museum Gardens	Parks and gardens	Tower Hamlets local park
New Brunswick Wharf	Amenity green space	Small open space
Newcastle Draw Dock	Green corridors	Linear open space
Old Railway at Fairfoot Road	Parks and gardens	Small open space
Paradise Gardens	Parks and gardens	Pocket park
Pennyfields Park	Parks and gardens	Small open space

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Pollard Square	Parks and gardens	Small open space
Pomell Way	Parks and gardens	Pocket park
Poplar Recreation Ground	Parks and gardens	Tower Hamlets local park
Prospect Park	Parks and gardens	Small open space
Queen Mary College Burial Ground 1 (NOVO)	Cemeteries and churchyards	Pocket park
Queen Mary College Burial Ground 2	Cemeteries and churchyards	Pocket park
Queen Mother's Garden	Parks and gardens	Pocket park
Raines Mansions	Parks and gardens	Pocket park
Ravenscroft Park	Parks and gardens	Small open space
Rectory Gardens	Parks and gardens	Pocket park
Reeves Road Allotments	Allotments, community gardens and city (urban farms)	Pocket park
Rhoda Street Open Space	Amenity green space	Pocket park
River Lea	Civic spaces	Linear open space
River Lea Navigation/Hackney Cut	Civic spaces	Linear open space
River Thames	Civic spaces	Linear open space
Robin Hood Gardens	Parks and gardens	Small open space
Roman Road Market Square	Civic spaces	Pocket park
Ropemakers Fields	Parks and gardens	Tower Hamlets local park
Ropewalk Gardens	Parks and gardens	Small open space
Rounton Road Public Open Space	Parks and gardens	Small open space
Royal Mint Square	Parks and gardens	Pocket park
Salmon Lane Canalside	Amenity green space	Pocket park
Schoolhouse Kickabout Area	Provision for children and teenagers	Pocket park
Selwyn Green	Parks and gardens	Pocket park

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Shacklewell Street Ball Games Area	Provision for children and teenagers	Pocket park
Shacklewell Street Community Garden	Provision for children and teenagers	Pocket park
Shadwell Basin	Civic spaces	Linear open space
Shandy Park	Parks and gardens	Tower Hamlets local park
Sidney Gardens	Parks and gardens	Pocket park
Sir John Cass's C of E Secondary School	Outdoor sports facilities	Small open space
Sir John McDougall Gardens	Parks and gardens	Local park and open space
Spitalfields Farm	Allotments, community gardens and city (urban farms)	Pocket park
St Andrew's Open Space	Parks and gardens	Small open space
St George's in the East	Cemeteries and churchyards	Tower Hamlets local park
St Jude's Nature Reserve	Parks and gardens	Pocket park
St Katharine's Dock	Civic spaces	Linear open space
St Leonard's Churchyard	Cemeteries and churchyards	Pocket park
St Paul's Churchyard	Cemeteries and churchyards	Pocket park
St Paul's Way Secondary School	Outdoor sports facilities	Tower Hamlets local park
St Stephen's Road	Amenity green space	Pocket park
St. Andrews Wharf Youth Project	Parks and gardens	Pocket park
St. Anne's Churchyard	Cemeteries and churchyards	Small open space
St. Bartholomew's Gardens	Cemeteries and churchyards	Small open space
St. Dunstan's Churchyard	Cemeteries and churchyards	Tower Hamlets local park
St. James Gardens	Parks and gardens	Small open space
St. John's Churchyard	Cemeteries and churchyards	Pocket park
St. John's Park	Parks and gardens	Small open space
St. Mary Bow	Cemeteries and churchyards	Pocket park

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St. Matthew's Church Gardens	Cemeteries and churchyards	Small open space
St. Matthias Old Church	Cemeteries and churchyards	Small open space
St. Peter's Churchyard	Cemeteries and churchyards	Pocket park
Stepney Clock Tower Gardens	Parks and gardens	Pocket park
Stepney Green Gardens	Parks and gardens	Small open space
Stepney Green Park	Parks and gardens	Local park and open space
Stepping Stones Farm	Allotments, community gardens and city (urban farms)	Tower Hamlets local park
Stonebridge Wharf	Parks and gardens	Pocket park
Stoneyard Lane	Parks and gardens	Pocket park
Strafford Street Play Area	Provision for children and teenagers	Pocket park
Swedenborg Gardens	Parks and gardens	Tower Hamlets local park
The Attlee Foundation Adventure Playground	Provision for children and teenagers	Pocket park
The Blessed John Roche Catholic School	Outdoor sports facilities	Small open space
The Greenway	Green corridors	Linear open space
The Oval	Parks and gardens	Pocket park
Three Colts Street / Mitre Street	Parks and gardens	Pocket park
Tobacco Dock	Green corridors	Linear open space
Tower Hamlets Cemetery Park	Natural and semi natural urban green spaces	Local park and open space
Tower Hill Terrace	Parks and gardens	Pocket park
Tower of London (Inner)	Civic spaces	Local park and open space
Tower of London (Outer)	Civic spaces	Tower Hamlets local park
Tower of London Gardens	Amenity green space	Pocket park
Trafalgar Gardens	Parks and gardens	Pocket park

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Tredegar Square Gardens	Parks and gardens	Small open space
Trinity Gardens	Parks and gardens	Small open space
Trinity Square Gardens	Parks and gardens	Small open space
Twelve Trees Crescent	Parks and gardens	Pocket park
Vallance Road Gardens	Parks and gardens	Small open space
Victoria Park	Parks and gardens	Metropolitan park
Virginia Gardens	Parks and gardens	Pocket park
Virginia Quay	Amenity green space	Pocket park
Wakefield Gardens	Parks and gardens	Pocket park
Wapping Gardens	Parks and gardens	Tower Hamlets local park
Wapping Green	Parks and gardens	Pocket park
Wapping Rose Gardens	Parks and gardens	Small open space
Wapping Woods	Parks and gardens	Tower Hamlets local park
Warner Green	Parks and gardens	Pocket park
Waterside Gardens	Parks and gardens	Pocket park
Weavers Adventure Playground	Provision for children and teenagers	Small open space
Weavers Fields	Parks and gardens	Local park and open space
Wellclose Street Rough	Parks and gardens	Pocket park
Westferry Circus	Amenity green space	Pocket park
Whitehorse Road Park	Amenity green space	Tower Hamlets local park
Wyvis Street Open Space	Parks and gardens	Pocket park
York Square	Parks and gardens	Pocket park

2.2 Publicly accessible open spaces in Tower Hamlets

The table below lists the site names for publicly accessible open spaces in Tower Hamlets and categorises them according to their function and size.

SITE NAME	FORMER PPG 17 TYPOLOGY	LOCAL HIERARCHY
22-28 Marsh Wall	Green corridors	Linear open space
Abbott Road Gardens	Amenity green space	Pocket park
Aberfeldy Millennium Green	Parks and gardens	Pocket park
Aberfeldy Playground	Provision for children and teenagers	Pocket park
Ackroyd Drive Allotments	Allotments, community gardens and city (urban farms)	Pocket park
Ackroyd Drive Open Space	Parks and gardens	Small open space
Albert Gardens	Parks and gardens	Pocket park
Aldgate Park, Braham St	Parks and gardens	Pocket park
All Saints Churchyard	Cemeteries and churchyards	Small open space
Allen Gardens	Parks and gardens	Tower Hamlets local park
Allen Gardens Play Area	Provision for children and teenagers	Pocket park
Altab Ali Park	Cemeteries and churchyards	Small open space
Alton Street Open Space	Parks and gardens	Small open space
Arbour Square Gardens	Parks and gardens	Pocket park
Archibald Open Space	Parks and gardens	Pocket park
Bancroft Road Nature Garden	Parks and gardens	Pocket park
Bartlett Park	Parks and gardens	Local park and open space
Baxendale Street Gardens	Parks and gardens	Pocket park

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Beaumont Square Gardens	Parks and gardens	Small open space
Belgrave Open Space	Parks and gardens	Small open space
Bethnal Green Gardens	Parks and gardens	Local park and open space
Bigland Green Open Space	Provision for children and teenagers	Pocket park
Boundary Gardens (Arnold Circus)	Parks and gardens	Pocket park
Boundary Playground	Provision for children and teenagers	Pocket park
Braithwaite Park	Parks and gardens	Small open space
Bromley Recreation Ground	Parks and gardens	Small open space
Cable Street Allotments	Allotments, community gardens and city (urban farms)	Small open space
Cabot Square	Parks and gardens	Small open space
Canada Square	Parks and gardens	Small open space
Canary Riverside	Civic spaces	Pocket park
Carlton Square and Gardens	Parks and gardens	Pocket park
Carlton Square Extension	Parks and gardens	Small open space
Caspian Wharf	Amenity green space	Pocket park
Cavell Street Gardens	Parks and gardens	Pocket park
Cephas Street Square	Amenity green space	Pocket park
Chicksand Ghat	Provision for children and teenagers	Pocket park
Chiltern Green	Amenity green space	Pocket park
Chrip Street Market Area 1	Civic spaces	Pocket park
Chrip Street Market Area 2	Civic spaces	Small open space
Christchurch Gardens	Cemeteries and churchyards	Pocket park

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Cotton Street/Bazely Street	Parks and gardens	Pocket park
Cubitt Town Junior and Infants School	Outdoor sports facilities	Small open space
Dockers Tanner Road	Parks and gardens	Pocket park
East India Dock Basin	Natural and semi natural urban green spaces	Local park and open space
East India Dock Square	Civic spaces	Small open space
Fern Street Open Space	Parks and gardens	Pocket park
Ford Square	Parks and gardens	Pocket park
Four Seasons Green	Parks and gardens	Pocket park
Furze Green Open Space	Parks and gardens	Small open space
Garrison Road/Legion Terrace	Amenity green space	Pocket park
George Green School	Outdoor sports facilities	Small open space
Gladstone Place	Amenity green space	Pocket park
Glamis Adventure Playground	Parks and gardens	Pocket park
Globe Road Open Space	Parks and gardens	Pocket park
Gosling Gardens	Parks and gardens	Pocket park
Great Eastern Slipway	Civic spaces	Small open space
Grove Hall Park	Parks and gardens	Tower Hamlets local park
Harley Grove	Amenity green space	Pocket park
Harley Square	Amenity green space	Small open space
Hellings Street Play Area	Provision for children and teenagers	Pocket park
Hermitage Riverside Gardens	Parks and gardens	Pocket park
Ion Square Gardens	Parks and gardens	Tower Hamlets local park
Island Gardens	Parks and gardens	Tower Hamlets local park
Jesus Green	Parks and gardens	Pocket park

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Jolly's Green	Parks and gardens	Small open space
Jubilee Gardens	Parks and gardens	Pocket park
Jubilee Park	Parks and gardens	Tower Hamlets local park
King Edward Memorial Park	Parks and gardens	Local park and open space
Kings Wharf	Parks and gardens	Pocket park
Langdon Park	Parks and gardens	Tower Hamlets local park
Langdon Park School	Outdoor sports facilities	Tower Hamlets local park
Leven Road Open Space	Parks and gardens	Small open space
Ligherman's Garden	Amenity green space	Small open space
Limehouse Fields	Parks and gardens	Pocket park
London Wall Gardens	Parks and gardens	Pocket park
Mallon Gardens	Parks and gardens	Pocket park
Mansford Street Open Space	Parks and gardens	Pocket park
Meath Gardens	Parks and gardens	Local park and open space
Mercers Burial Ground	Cemeteries and churchyards	Pocket park
Middleton Green	Parks and gardens	Small open space
Mile End Park	Parks and gardens	District park
Mile End Road Waste	Civic spaces	Pocket park
Millwall Dock Open Space	Parks and gardens	Small open space
Millwall Outer Dock Slipway	Civic spaces	Pocket park
Millwall Park	Parks and gardens	District park
Ming Street Open Space	Amenity green space	Pocket park
Morpeth Secondary School	Outdoor sports facilities	Small open space
Museum Gardens	Parks and gardens	Tower Hamlets local park
New Brunswick Wharf	Amenity green space	Small open space
Paradise Gardens	Parks and gardens	Pocket park

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Pennyfields Park	Parks and gardens	Small open space
Pollard Square	Parks and gardens	Small open space
Poplar Recreation Ground	Parks and gardens	Tower Hamlets local park
Prospect Park	Parks and gardens	Small open space
Queen Mother's Garden	Parks and gardens	Pocket park
Raines Mansions	Parks and gardens	Pocket park
Ravenscroft Park	Parks and gardens	Small open space
Rectory Gardens	Parks and gardens	Pocket park
Reeves Road Allotments	Allotments, community gardens and city (urban farms)	Pocket park
Rhoda Street Open Space	Amenity green space	Pocket park
Robin Hood Gardens	Parks and gardens	Small open space
Roman Road Market Square	Civic spaces	Pocket park
Ropemakers Fields	Parks and gardens	Tower Hamlets local park
Ropewalk Gardens	Parks and gardens	Small open space
Rounton Road Public Open Space	Parks and gardens	Small open space
Royal Mint Square	Parks and gardens	Pocket park
Salmon Lane Canalside	Amenity green space	Pocket park
Schoolhouse Kickabout Area	Provision for children and teenagers	Pocket park
Selwyn Green	Parks and gardens	Pocket park
Shacklewell Street Ball Games Area	Provision for children and teenagers	Pocket park
Shacklewell Street Community Garden	Provision for children and teenagers	Pocket park
Shandy Park	Parks and gardens	Tower Hamlets local park

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Sidney Gardens	Parks and gardens	Pocket park
Sir John Cass's C of E Secondary School	Outdoor sports facilities	Small open space
Sir John McDougall Gardens	Parks and gardens	Local park and open space
Spitalfields Farm	Allotments, community gardens and city (urban farms)	Pocket park
St Andrew's Open Space	Parks and gardens	Small open space
St George's in the East	Cemeteries and churchyards	Tower Hamlets local park
St Jude's Nature Reserve	Parks and gardens	Pocket park
St Leonard's Churchyard	Cemeteries and churchyards	Pocket park
St Paul's Churchyard	Cemeteries and churchyards	Pocket park
St Paul's Way Secondary School	Outdoor sports facilities	Tower Hamlets local park
St Stephen's Road	Amenity green space	Pocket park
St. Andrews Wharf Youth Project	Parks and gardens	Pocket park
St. Anne's Churchyard	Cemeteries and churchyards	Small open space
St. Bartholomew's Gardens	Cemeteries and churchyards	Small open space
St. Dunstan's Churchyard	Cemeteries and churchyards	Tower Hamlets local park
St. James Gardens	Parks and gardens	Small open space
St. John's Churchyard	Cemeteries and churchyards	Pocket park
St. John's Park	Parks and gardens	Small open space
St. Mary Bow	Cemeteries and churchyards	Pocket park
St. Matthew's Church Gardens	Cemeteries and churchyards	Small open space
St. Matthias Old Church	Cemeteries and churchyards	Small open space
St. Peter's Churchyard	Cemeteries and churchyards	Pocket park
Stepney Clock Tower Gardens	Parks and gardens	Pocket park
Stepney Green Gardens	Parks and gardens	Small open space
Stepney Green Park	Parks and gardens	Local park and open space

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Stepping Stones Farm	Allotments, community gardens and city (urban farms)	Tower Hamlets local park
Stonebridge Wharf	Parks and gardens	Pocket park
Stoneyard Lane	Parks and gardens	Pocket park
Strafford Street Play Area	Provision for children and teenagers	Pocket park
Swedenborg Gardens	Parks and gardens	Tower Hamlets local park
The Attlee Foundation Adventure Playground	Provision for children and teenagers	Pocket park
The Blessed John Roche Catholic School	Outdoor sports facilities	Small open space
The Oval	Parks and gardens	Pocket park
Three Colts Street / Mitre Street	Parks and gardens	Pocket park
Tower Hamlets Cemetery Park	Natural and semi natural urban green spaces	Local park and open space
Tower Hill Terrace	Parks and gardens	Pocket park
Tower of London (Outer)	Civic spaces	Tower Hamlets local park
Tower of London Gardens	Amenity green space	Pocket park
Trafalgar Gardens	Parks and gardens	Pocket park
Tredegar Square Gardens	Parks and gardens	Small open space
Trinity Gardens	Parks and gardens	Small open space
Trinity Square Gardens	Parks and gardens	Small open space
Twelve Trees Crescent	Parks and gardens	Pocket park
Vallance Road Gardens	Parks and gardens	Small open space
Victoria Park	Parks and gardens	Metropolitan park
Virginia Gardens	Parks and gardens	Pocket park
Virginia Quay	Amenity green space	Pocket park

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Wakefield Gardens	Parks and gardens	Pocket park
Wapping Gardens	Parks and gardens	Tower Hamlets local park
Wapping Green	Parks and gardens	Pocket park
Wapping Rose Gardens	Parks and gardens	Small open space
Wapping Woods	Parks and gardens	Tower Hamlets local park
Warner Green	Parks and gardens	Pocket park
Waterside Gardens	Parks and gardens	Pocket park
Weavers Adventure Playground	Provision for children and teenagers	Small open space
Weavers Fields	Parks and gardens	Local park and open space
Westferry Circus	Amenity green space	Pocket park
Whitehorse Road Park	Amenity green space	Tower Hamlets local park
Wyvis Street Open Space	Parks and gardens	Pocket park
York Square	Parks and gardens	Pocket park

2.3 Quality and value ratings for audited open space sites

The table below lists the quality and value ratings for sites in Tower Hamlets and identifies their function, size and ownership category.

SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
120-132 Chrisp Ctreet	Amenity green space	Linear open space	Other	-	+
21 Wapping Lane	Amenity green space	Linear open space	Other	-	+
25 Churchill Place	Amenity green space	Linear open space	Other	-	-
Abbott Road Gardens	Amenity green space	Pocket park	Other	-	+
Aberfeldy Millennium Green	Parks and gardens	Pocket park	Other	+	-
Aberfeldy Playground	Provision for children and teenagers	Pocket park	Other	+	+
Ackroyd Drive Allotments	Allotments, community gardens and city (urban farms)	Pocket park	Other	-	-
Ackroyd Drive Open Space	Parks and gardens	Small open space	LBTH	-	-
Albert Gardens	Parks and gardens	Pocket park	LBTH	+	-
Aldgate Park, Braham St	Parks and gardens	Pocket park	Other	-	-
All Saints Churchyard	Cemeteries and churchyards	Small open space	LBTH	+	+
Allen Gardens	Parks and gardens	Tower Hamlets local park	LBTH	-	+
Allen Gardens Play Area	Provision for children and teenagers	Pocket park	LBTH	-	-
Altab Ali Park	Cemeteries and churchyards	Small open space	LBTH	-	+
Alton Street Open Space	Parks and gardens	Small open space	LBTH	+	-
Arbour Square Gardens	Parks and gardens	Pocket park	LBTH	+	-
Archibald Open Space	Parks and gardens	Pocket park	LBTH	+	+

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SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
Bancroft Road Cemetery	Cemeteries and churchyards	Pocket park	Other	-	-
Bancroft Road Nature Garden	Parks and gardens	Pocket park	Other	-	-
Bartlett Park	Parks and gardens	Local park and open space	LBTH	-	+
Baxendale Street Gardens	Parks and gardens	Pocket park	LBTH	+	-
Beaumont Square Gardens	Parks and gardens	Small open space	LBTH	-	+
Belgrave Open Space	Parks and gardens	Small open space	LBTH	-	-
Bethnal Green Gardens	Parks and gardens	Local park and open space	LBTH	+	+
Bigland Green Open Space	Provision for children and teenagers	Pocket park	Other	+	-
Blackwall Basin and Poplar Dock	Civic spaces	Linear open space	Other	-	+
Boundary Gardens (Arnold Circus)	Parks and gardens	Pocket park	LBTH	+	-
Boundary Playground	Provision for children and teenagers	Pocket park	Other	-	-
Braithwaite Park	Parks and gardens	Small open space	LBTH	-	-
Bromley Recreation Ground	Parks and gardens	Small open space	LBTH	+	+
Cable Street Allotments	Allotments, community gardens and city (urban farms)	Small open space	Other	-	+
Cabot Square	Parks and gardens	Small open space	Other	+	-
Caledonian Wharf	Green corridors	Linear open space	LBTH	-	-
Canada Square	Parks and gardens	Small open space	Other	+	-
Canary Riverside	Civic spaces	Pocket park	Other	+	+
Carlton Square and Gardens	Parks and gardens	Pocket park	LBTH	-	-

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SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
Carlton Square Extension	Parks and gardens	Small open space	Other	-	-
Carron Continental Wharf	Green corridors	Linear open space	LBTH	+	+
Caspian Wharf	Amenity green space	Pocket park	Other	+	+
Castle Wharf	Green corridors	Linear open space	Other	-	+
Cavell Street Gardens	Parks and gardens	Pocket park	LBTH	-	-
Cephas Street Square	Amenity green space	Pocket park	Other	-	-
Chicksand Ghat	Provision for children and teenagers	Pocket park	Other	+	+
Chiltern Green	Amenity green space	Pocket park	Other	+	+
Chrip Street Market Area 1	Civic spaces	Pocket park	Other	+	+
Chrip Street Market Area 2	Civic spaces	Small open space	Other	+	+
Christchurch Gardens	Cemeteries and churchyards	Pocket park	LBTH	-	+
Claredale Street / Sheldon Place	Amenity green space	Linear open space	Other	-	-
Compass Point	Green corridors	Linear open space	LBTH	+	-
Cotton Street/Bazely Street	Parks and gardens	Pocket park	LBTH	-	-
Dockers Tanner Road	Parks and gardens	Pocket park	LBTH	-	-
East India Dock Basin	Natural and semi natural urban green spaces	Local park and open space	Other	+	+
East India Dock Square	Civic spaces	Small open space	Other	-	+
Fern Street Open Space	Parks and gardens	Pocket park	LBTH	-	-
Ford Square	Parks and gardens	Pocket park	LBTH	-	+
Four Seasons Green	Parks and gardens	Pocket park	Other	+	+
Furze Green Open Space	Parks and gardens	Small open space	LBTH	-	-
Garrison Road/Legion Terrace	Amenity green space	Pocket park	Other	+	+

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SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
Gladstone Place	Amenity green space	Pocket park	Other	+	+
Glamis Adventure Playground	Parks and gardens	Pocket park	LBTH	+	+
Globe Road Open Space	Parks and gardens	Pocket park	LBTH	-	-
Gosling Gardens	Parks and gardens	Pocket park	LBTH	-	-
Great Eastern Slipway	Civic spaces	Small open space	LBTH	-	+
Grove Hall Park	Parks and gardens	Tower Hamlets local park	LBTH	-	+
Harley Grove	Amenity green space	Pocket park	Other	-	-
Harley Square	Amenity green space	Small open space	Other	-	+
Hellings Street Play Area	Provision for children and teenagers	Pocket park	LBTH	+	+
Hermitage Basin	Civic spaces	Linear open space	LBTH	-	-
Hermitage Riverside Gardens	Parks and gardens	Pocket park	Other	+	+
Ion Square Gardens	Parks and gardens	Tower Hamlets local park	LBTH	-	+
Island Gardens	Parks and gardens	Tower Hamlets local park	LBTH	+	-
Jesus Green	Parks and gardens	Pocket park	LBTH	-	-
Jewish Burial Ground Brady Street	Cemeteries and churchyards	Tower Hamlets local park	Other	-	-
Johnson's Draw Dock	Green corridors	Linear open space	LBTH	-	-
Jolly's Green	Parks and gardens	Small open space	LBTH	-	-
Jubilee Gardens	Parks and gardens	Pocket park	Other	+	+
Jubilee Park	Parks and gardens	Tower Hamlets local park	Other	-	-

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SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
King Edward Memorial Park	Parks and gardens	Local park and open space	LBTH	+	+
Kings Wharf	Parks and gardens	Pocket park	LBTH	+	-
Langdon Park	Parks and gardens	Tower Hamlets local park	LBTH	+	-
Leven Road Open Space	Parks and gardens	Small open space	LBTH	+	-
Lighterman's Garden	Amenity green space	Small open space	Other	+	-
Limehouse Basin	Civic spaces	Linear open space	Other	+	+
London Wall Gardens	Parks and gardens	Pocket park	Other	-	+
London Yard	Green corridors	Linear open space	LBTH	+	+
Maconochies Wharf	Green corridors	Linear open space	LBTH	+	+
Mallon Gardens	Parks and gardens	Pocket park	LBTH	-	-
Mansford Street Open Space	Parks and gardens	Pocket park	Other	+	+
Masthouse Terrace Play Area	Green corridors	Linear open space	LBTH	-	+
Meath Gardens	Parks and gardens	Local park and open space	LBTH	+	+
Meath Gardens Allotments	Allotments, community gardens and city (urban farms)	Pocket park	Other	+	-
Mercers Burial Ground	Cemeteries and churchyards	Pocket park	LBTH	-	-
Middleton Green	Parks and gardens	Small open space	LBTH	-	+
Mile End Park	Parks and gardens	District park	LBTH	-	+
Mile End Park	Parks and gardens	District park	LBTH	-	-
Mile End Park	Parks and gardens	District park	LBTH	+	+
Mile End Park	Parks and gardens	District park	LBTH	-	-

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SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
Mile End Park	Parks and gardens	District park	LBTH	-	-
Mile End Road Waste	Civic spaces	Pocket park	Other	-	+
Millwall Dock	Civic spaces	Linear open space	Other	-	+
Millwall Dock Open Space	Parks and gardens	Small open space	Other	-	-
Millwall Outer Dock Slipway	Civic spaces	Pocket park	Other	-	+
Millwall Park	Parks and gardens	District park	LBTH	-	+
Ming Street Open Space	Amenity green space	Pocket park	Other	-	+
Mudchute Farm	Allotments, community gardens and city (urban farms)	District park	LBTH	+	+
Museum Gardens	Parks and gardens	Tower Hamlets local park	LBTH	-	-
New Brunswick Wharf	Amenity green space	Small open space	Other	+	+
Newcastle Draw Dock	Green corridors	Linear open space	LBTH	-	+
Old Railway at Fairfoot Road	Parks and gardens	Small open space	Other	-	-
Paradise Gardens	Parks and gardens	Pocket park	LBTH	-	-
Pennyfields Park	Parks and gardens	Small open space	LBTH	+	-
Pollard Square	Parks and gardens	Small open space	LBTH	-	-
Poplar Recreation Ground	Parks and gardens	Tower Hamlets local park	LBTH	+	+
Prospect Park	Parks and gardens	Small open space	LBTH	-	-
Queen Mary College Burial Ground 1 (NOVO)	Cemeteries and churchyards	Pocket park	Other	-	-
Queen Mother's Garden	Parks and gardens	Pocket park	Other	+	-

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SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
Raines Mansions	Parks and gardens	Pocket park	LBTH	-	-
Ravenscroft Park	Parks and gardens	Small open space	LBTH	-	+
Rectory Gardens	Parks and gardens	Pocket park	LBTH	+	-
Reeves Road Allotments	Allotments, community gardens and city (urban farms)	Pocket park	Other	-	-
Rhoda Street Open Space	Amenity green space	Pocket park	LBTH	-	+
Robin Hood Gardens	Parks and gardens	Small open space	Other	-	+
Roman Road Market Square	Civic spaces	Pocket park	Other	-	+
Ropemakers Fields	Parks and gardens	Tower Hamlets local park	LBTH	+	+
Ropewalk Gardens	Parks and gardens	Small open space	LBTH	-	+
Rounton Road Public Open Space	Parks and gardens	Small open space	LBTH	-	-
Royal Mint Square	Parks and gardens	Pocket park	LBTH	-	-
Salmon Lane Canalside	Amenity green space	Pocket park	Other	-	+
Schoolhouse Kickabout Area	Provision for children and teenagers	Pocket park	LBTH	-	-
Selwyn Green	Parks and gardens	Pocket park	LBTH	-	-
Shacklewell Street Ball Games Area	Provision for children and teenagers	Pocket park	LBTH	-	-
Shacklewell Street Community Garden	Provision for children and teenagers	Pocket park	LBTH	+	-
Shadwell Basin	Civic spaces	Linear open space	LBTH	-	+
Shandy Park	Parks and gardens	Tower Hamlets local park	LBTH	-	-

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SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
Sidney Gardens	Parks and gardens	Pocket park	LBTH	+	-
Sir John McDougall Gardens	Parks and gardens	Local park and open space	LBTH	-	+
Spitalfields Farm	Allotments, community gardens and city (urban farms)	Pocket park	LBTH	+	+
St George's in the East	Cemeteries and churchyards	Tower Hamlets local park	LBTH	-	+
St Jude's Nature Reserve	Parks and gardens	Pocket park	Other	-	-
St Katharine's Dock	Civic spaces	Linear open space	Other	+	+
St Leonard's Churchyard	Cemeteries and churchyards	Pocket park	Other	-	+
St Paul's Churchyard	Cemeteries and churchyards	Pocket park	Other	-	+
St Stepehen's Road	Amenity green space	Pocket park	Other	+	+
St. Andrews Wharf Youth Project	Parks and gardens	Pocket park	Other	+	-
St. Anne's Churchyard	Cemeteries and churchyards	Small open space	LBTH	-	+
St. Bartholomew's Gardens	Cemeteries and churchyards	Small open space	LBTH	+	+
St. Dunstan's Churchyard	Cemeteries and churchyards	Tower Hamlets local park	LBTH	+	+
St. James Gardens	Parks and gardens	Small open space	LBTH	-	+
St. John's Churchyard	Cemeteries and churchyards	Pocket park	LBTH	-	+
St. John's Park	Parks and gardens	Small open space	LBTH	-	+
St. Mary Bow	Cemeteries and churchyards	Pocket park	LBTH	-	+
St. Matthew's Church Gardens	Cemeteries and churchyards	Small open space	LBTH	-	+
St. Matthias Old Church	Cemeteries and churchyards	Small open space	LBTH	+	+
St. Peter's Churchyard	Cemeteries and churchyards	Pocket park	Other	+	+

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SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
Stepney Clock Tower Gardens	Parks and gardens	Pocket park	LBTH	+	-
Stepney Green Gardens	Parks and gardens	Small open space	LBTH	-	-
Stepney Green Park	Parks and gardens	Local park and open space	LBTH	-	+
Stepping Stones Farm	Allotments, community gardens and city (urban farms)	Tower Hamlets local park	Other	+	+
Stonebridge Wharf	Parks and gardens	Pocket park	LBTH	-	-
Stoneyard Lane	Parks and gardens	Pocket park	LBTH	-	-
Strafford Street Play Area	Provision for children and teenagers	Pocket park	Other	+	-
Swedenborg Gardens	Parks and gardens	Tower Hamlets local park	LBTH	-	-
The Greenway	Green corridors	Linear open space	LBTH	+	+
The Oval	Parks and gardens	Pocket park	LBTH	-	-
Three Colts Street / Mitre Street	Parks and gardens	Pocket park	LBTH	-	-
Tobacco Dock	Green corridors	Linear open space	Other	+	+
Tower Hamlets Cemetery Park	Natural and semi natural urban green spaces	Local park and open space	LBTH	+	+
Tower Hill Terrace	Parks and gardens	Pocket park	Other	-	-
Tower of London (Inner)	Civic spaces	Local park and open space	Other	+	+
Tower of London (Outer)	Civic spaces	Tower Hamlets local park	Other	+	+
Tower of London Gardens	Amenity green space	Pocket park	Other	-	+
Trafalgar Gardens	Parks and gardens	Pocket park	LBTH	+	+

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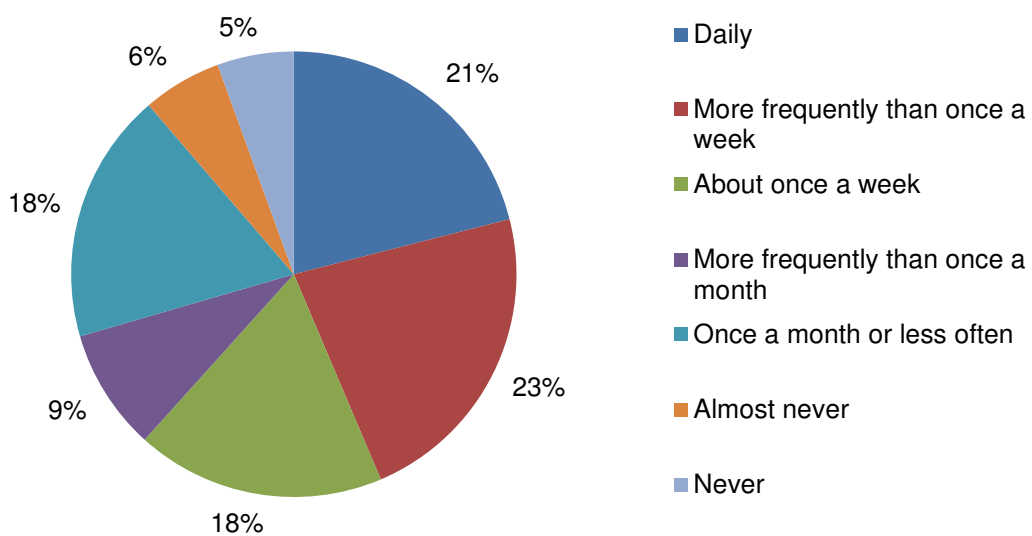
SITE NAME	FUNCTION (FORMER PPG 17 TYPOLOGY)	SIZE (LOCAL HIERARCHY)	OWNER	QUALITY RATING	VALUE RATING
Tredegar Square Gardens	Parks and gardens	Small open space	LBTH	+	-
Trinity Gardens	Parks and gardens	Small open space	LBTH	+	-
Trinity Square Gardens	Parks and gardens	Small open space	LBTH	+	+
Twelve Trees Crescent	Parks and gardens	Pocket park	LBTH	-	-
Vallance Road Gardens	Parks and gardens	Small open space	LBTH	-	+
Victoria Park	Parks and gardens	Metropolitan park	LBTH	+	+
Virginia Gardens	Parks and gardens	Pocket park	LBTH	-	-
Virginia Quay	Amenity green space	Pocket park	Other	-	+
Wakefield Gardens	Parks and gardens	Pocket park	Other	-	-
Wapping Gardens	Parks and gardens	Tower Hamlets local park	LBTH	+	+
Wapping Green	Parks and gardens	Pocket park	LBTH	+	-
Wapping Rose Gardens	Parks and gardens	Small open space	LBTH	-	-
Wapping Woods	Parks and gardens	Tower Hamlets local park	LBTH	-	-
Warner Green	Parks and gardens	Pocket park	LBTH	+	-
Waterside Gardens	Parks and gardens	Pocket park	LBTH	+	-
Weavers Fields	Parks and gardens	Local park and open space	LBTH	+	+
Westferry Circus	Amenity green space	Pocket park	Other	+	+
Whitehorse Road Park	Amenity green space	Tower Hamlets local park	LBTH	+	+
Wyvis Street Open Space	Parks and gardens	Pocket park	LBTH	-	-
York Square	Parks and gardens	Pocket park	LBTH	-	-

SUPPORTING INFORMATION FOR CHAPTER 3

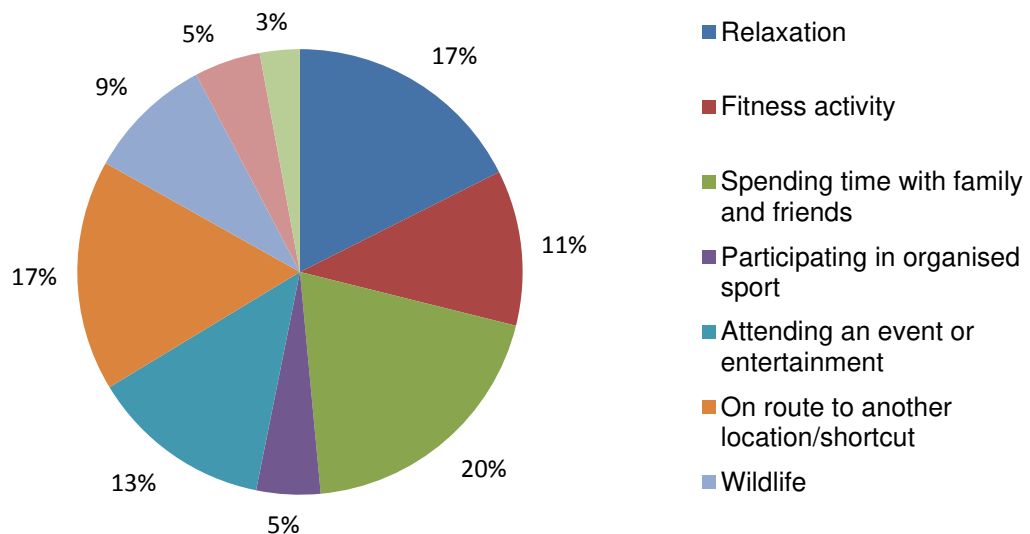
3.1 Culture, leisure and open spaces telephone survey 2016 summary results

The Council provides a variety of parks and open spaces in Tower Hamlets. The most well-known is Victoria Park, however, there are over 100 other parks and open spaces the Council provides and maintains for those who live here, work here, study here or who are just visiting the area.

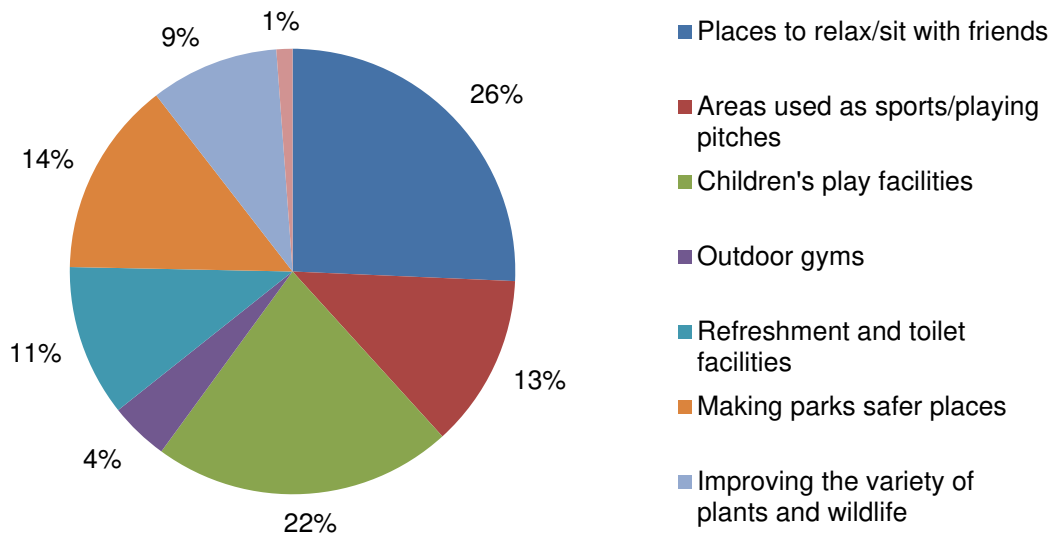
How frequently, if ever, do you visit or use open spaces in the borough?



Which of the following are your main reasons for visiting a park or open space?

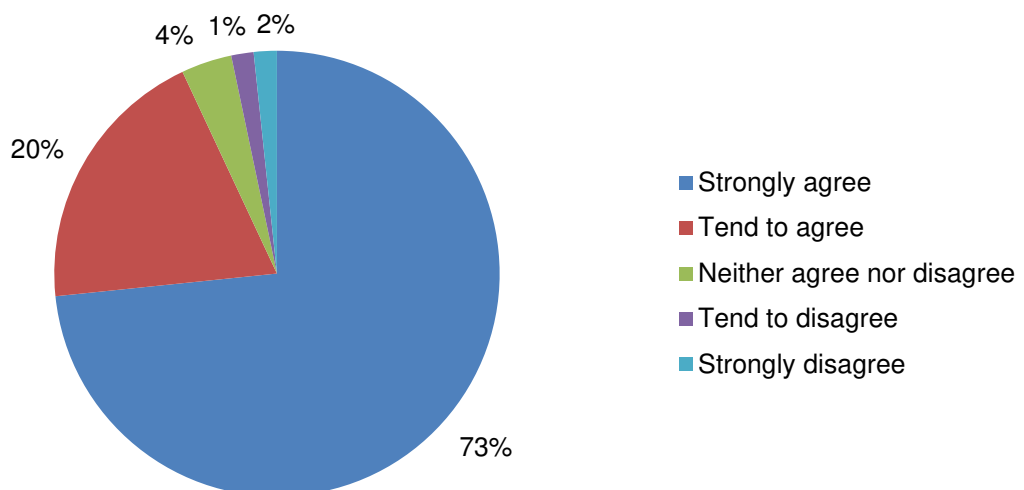


As the number of people in Tower Hamlets grows, more people will use the parks and open spaces. The Council want to make sure that parks and open spaces meet the needs of residents. However, the demand on the limited space in the borough means that decisions have to be made about how the open space is best used. Bearing in mind that if space is set aside for one specific purpose, it may be instead of another activity, which three of the following are the most important uses of space for you personally?

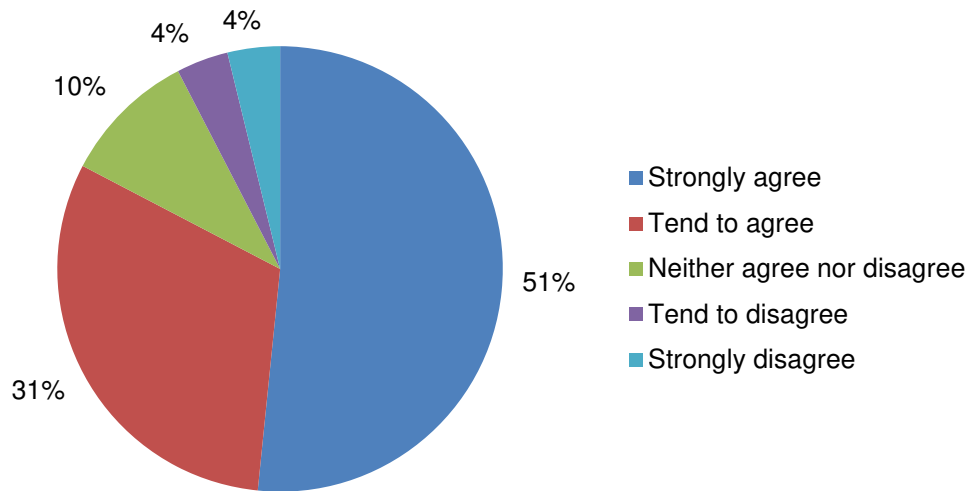


To what extent do you agree with the following statements?

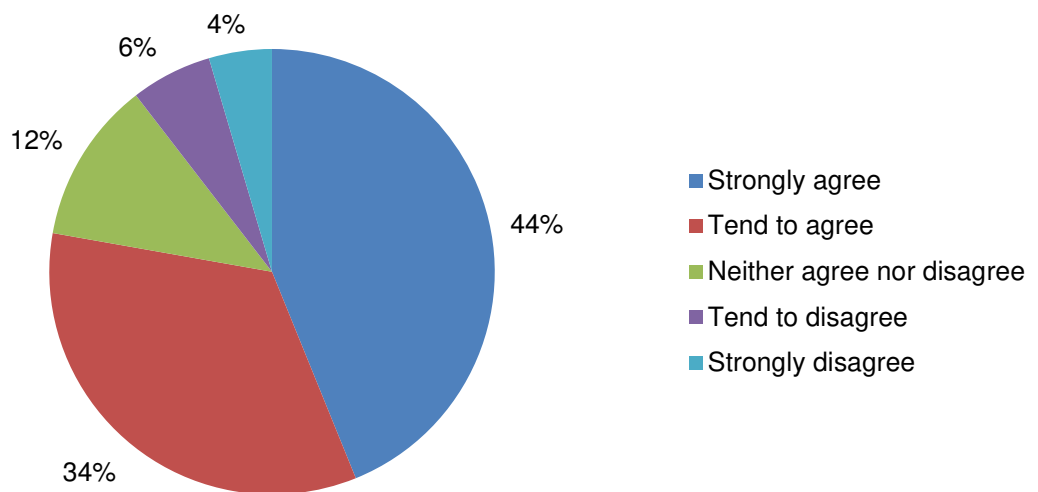
a) I can access and use my local park easily



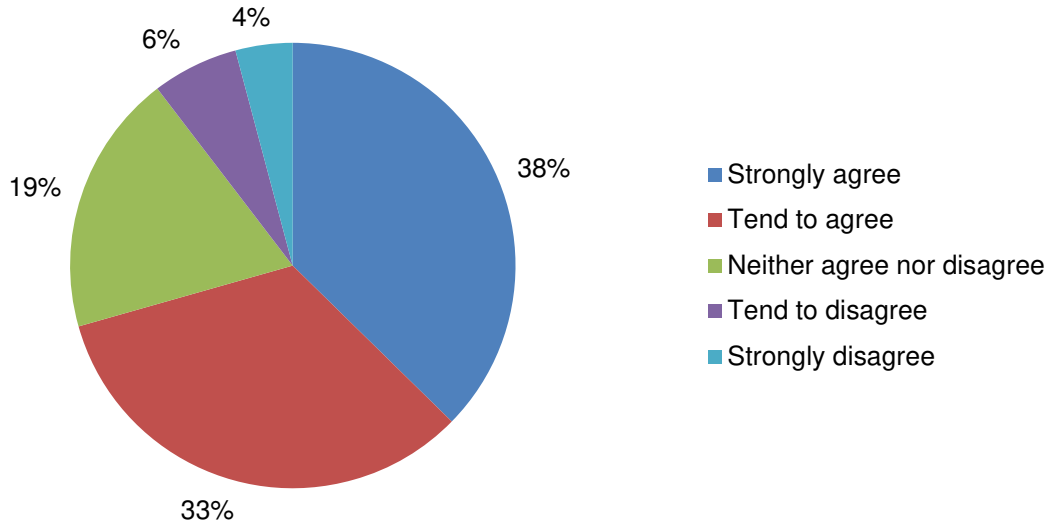
b) Parks in Tower Hamlets provide me with opportunities to be physically active



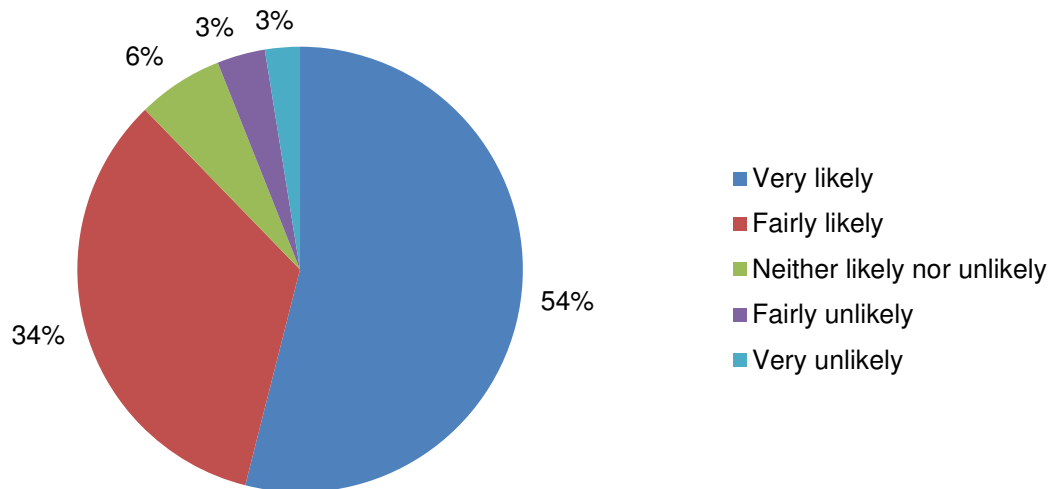
c) Tower Hamlet's parks and open spaces are well maintained



Thinking about the role of parks and open spaces in the community – to what extent do you agree or disagree that they help bring people of different backgrounds together?



How likely or unlikely would you be to recommend Tower Hamlets parks and open spaces to a friend or family member?



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CHAPTER 6: MAPS

Map 1 – Indices of Multiple Deprivation 2015

Map 2 – Distribution of Open Spaces

Map 3 – Borough Framework Map

Map 4 – Places North Borough Framework Map

Map 5 – Places East Borough Framework Map

Map 6 – Places South Borough Framework Map

Map 7 – Places West Borough Framework Map

Map 8 – Lines of Severance

Map 9 – Publicly Accessible Open Space (Excluding Water Space)

Map 10 – Access to all Parks above 1 ha (Tower Hamlets Local Parks) in 2017

Map 11 – Access to all Parks above 2 ha (Local Parks) in 2017

Map 12 – Access to all Parks above 20 ha (Major Parks) in 2017

Map 13 – Public Transport Accessibility Levels

Map 14 – Quality of Parks and Open Spaces Compared to Standards

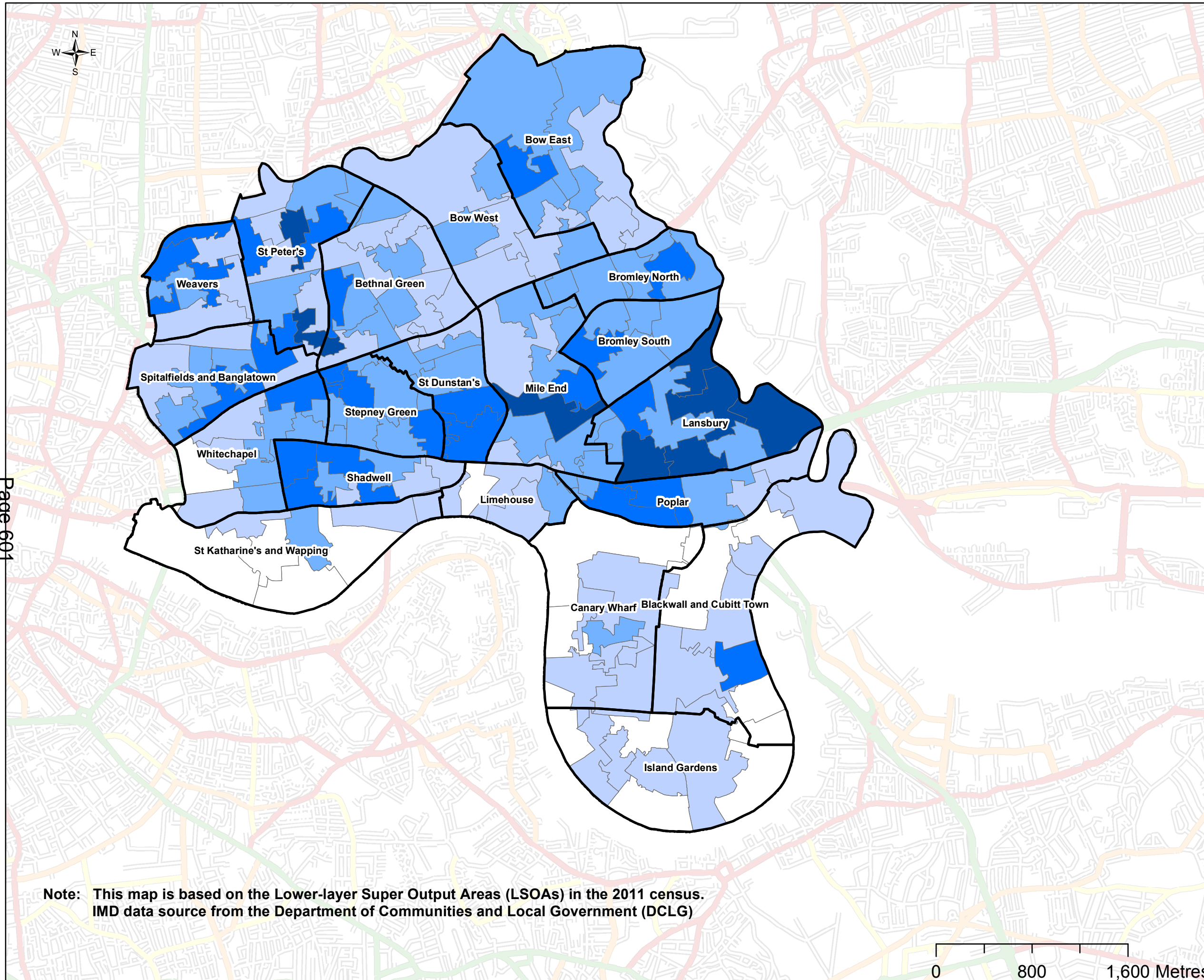
Map 15 – Value of Parks and Open Spaces Compared to Standards

Map 16 – Sites of Importance for Nature Conservation

Map 17 – Access to all Parks above 1 ha (Tower Hamlets Local Parks) in 2030

Map 18 – Access to all Parks above 2 ha (Local Parks) in 2030

Map 19 – Access to all Parks above 20 ha (Major Parks) in 2030



**Tower Hamlets
Open Space Strategy 2017**

Indices of Multiple Deprivation
2015
Map No: 1

LBTH Wards
Lower-layer Super Output Areas (LSOAs)
Index of Multiple Deprivation (IMD) Decile
(where 1 is most deprived 10% of LSOAs)

National rankings

- 5% most deprived areas
- 5-10 % most deprived areas
- 10-20 % most deprived areas
- 20-50 % most deprived areas
- 50% and above areas

The multiple deprivation index takes into account the people who live in each lower super output area and how they rank compared to other lower super output areas in the UK. It looks at the: Income, Employment, Health, Education, Housing and Access to services.

Revised by Governance (LBTH) Jan 2017

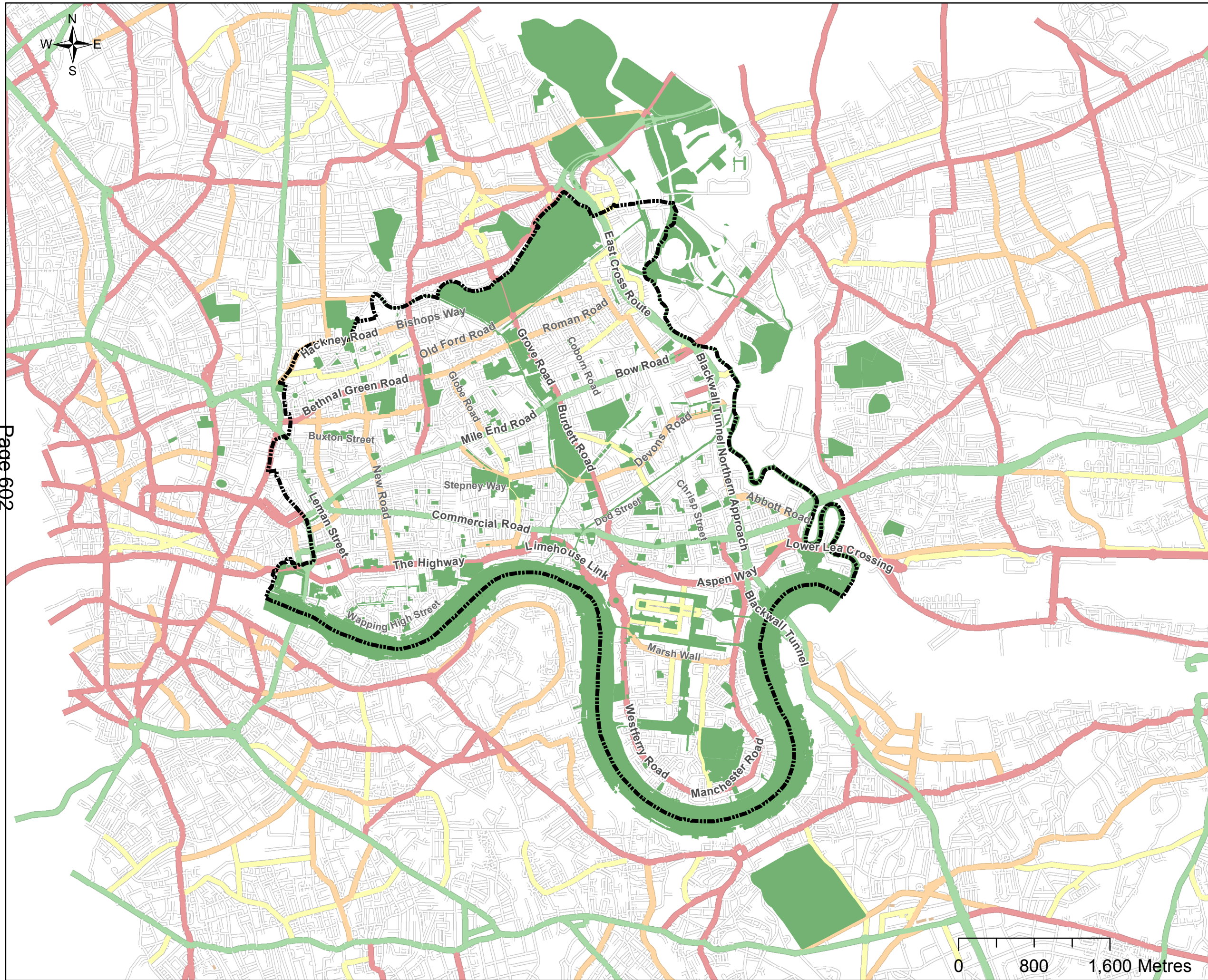
Drawn by: WN	Checked by: KO	Revision: TD
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Map No: 1	Date: 26 Jan 2017
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Scale: 1:30,000 at A3





Note: This map is based on the Lower-layer Super Output Areas (LSOAs) in the 2011 census. IMD data source from the Department of Communities and Local Government (DCLG)



Tower Hamlets Open Space Strategy 2017

Distribution of Open Spaces

Map No: 2

-  Borough Boundary
-  Open Spaces 2017

This map shows the distribution of open spaces in Tower Hamlets.

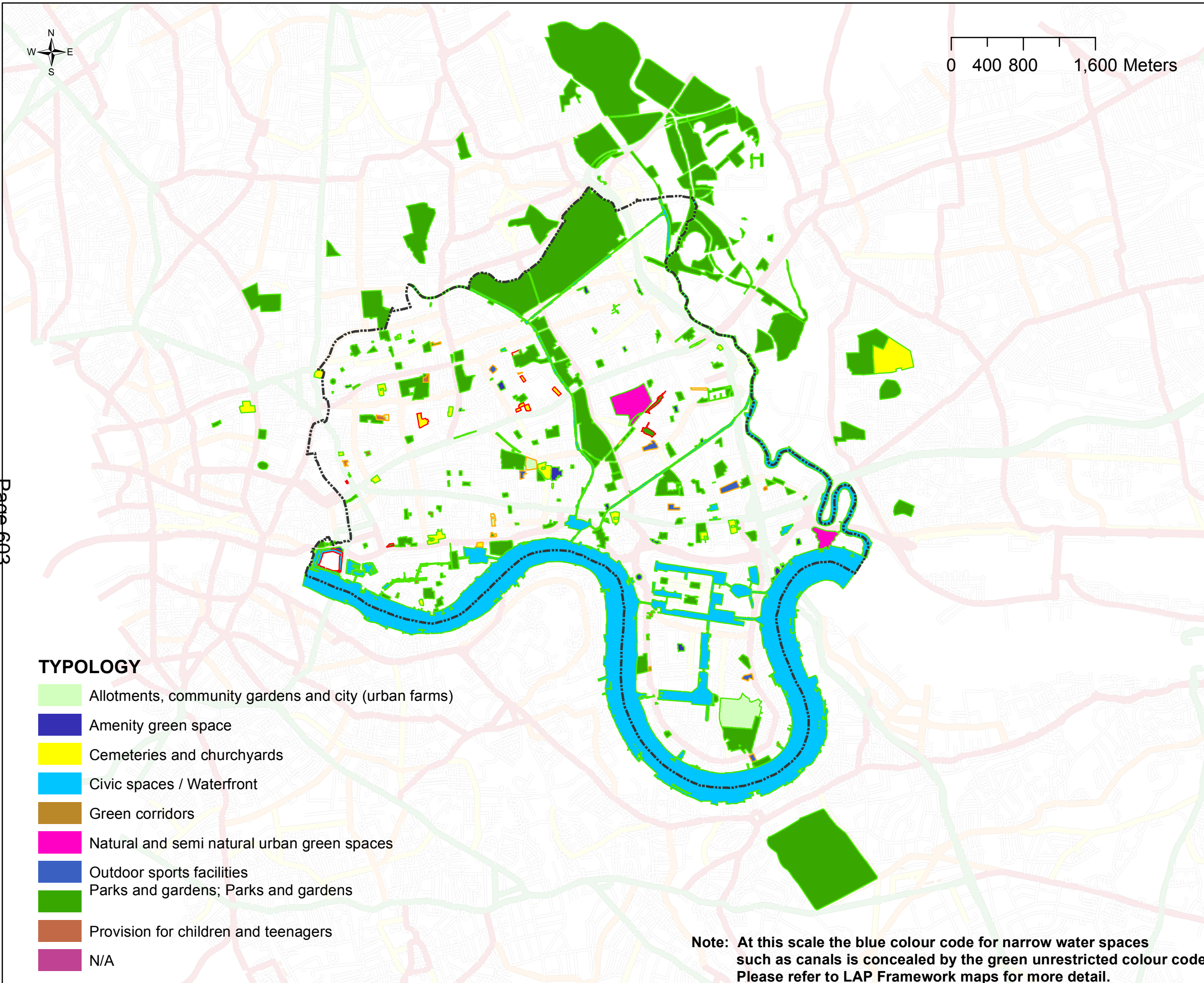
Open Spaces on this map include all open areas consisting of rivers, docks, canals and burial grounds etc. whether or not they are accessible to the public. This is in line with the wider definition of open spaces as contained in the Tower Hamlets Local Plan.

Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 2	Date: 26 Jan 2017	

Scale: 1:30,000 at A3





Tower Hamlets
Open Space Strategy 2017

Borough Framework Map
Map No: 3

- Borough Boundary
ACCESS
 Partially Restricted
 Restricted
 Unrestricted

This map shows the distribution of open spaces in Tower Hamlets and within 1.2km of the borough and identifies the type of open spaces.

TYOLOGY

- Allotments, community gardens and city (urban farms)
- Amenity green space
- Cemeteries and churchyards
- Civic spaces / Waterfront
- Green corridors
- Natural and semi natural urban green spaces
- Outdoor sports facilities
- Parks and gardens; Parks and gardens
- Provision for children and teenagers
- N/A

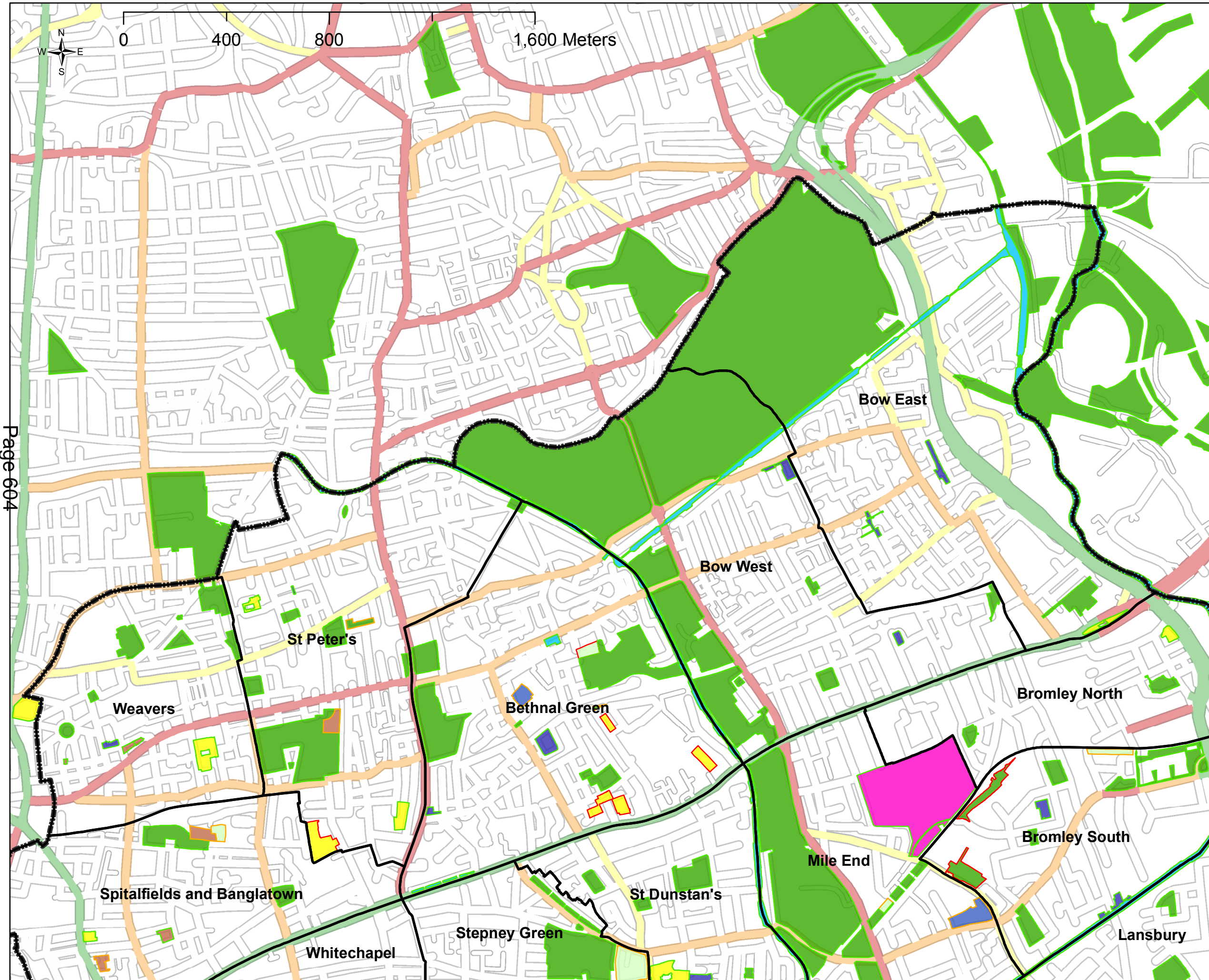
Note: At this scale the blue colour code for narrow water spaces such as canals is concealed by the green unrestricted colour code. Please refer to LAP Framework maps for more detail.

Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 3	Date: 26 Jan 2017	

Scale: 1:30,000 at A3





Tower Hamlets
Open Space Strategy 2017

Places North
Borough Framework Map
Map No: 4

- LBTH Wards
- Borough Boundary
- ACCESS**
- Partially Restricted
- Restricted
- Unrestricted

- TYPOLGY**
- Allotments, community gardens and city (urban farms)
- Amenity green space
- Cemeteries and churchyards
- Civic spaces / Waterfront
- Green corridors
- Natural and semi natural urban green spaces
- Outdoor sports facilities
- Parks and gardens; Parks and gardens
- Provision for children and teenagers
- N/A

This map shows the distribution of open spaces in Tower Hamlets and within 1.2km of the borough and identifies the type of open spaces.

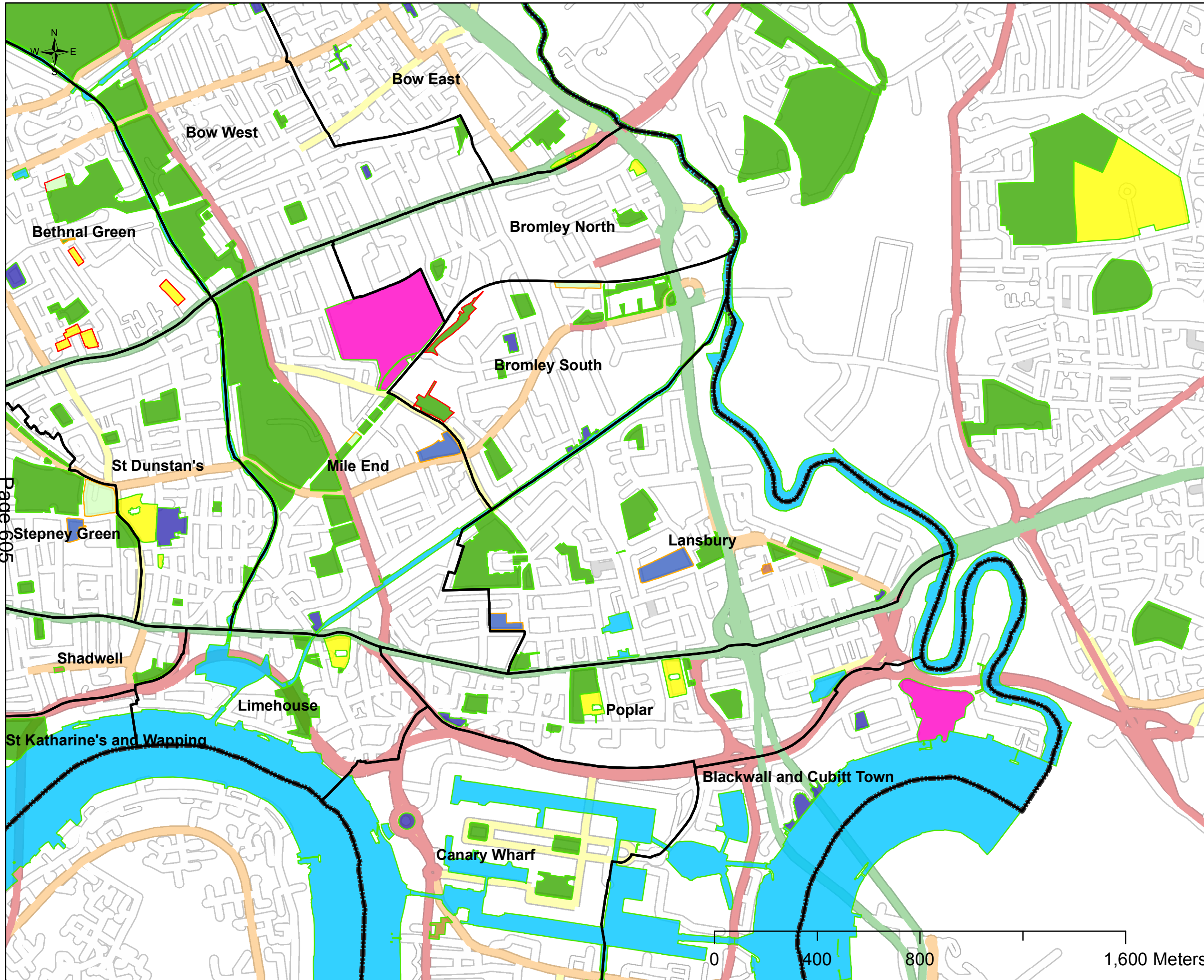
Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
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Map No: 4	Date: 26 Jan 2017
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Scale: 1:30,000 at A3





Tower Hamlets
Open Space Strategy 2017

Places East
Borough Framework Map
Map No: 5

ACCESS

- Partially Restricted
- Restricted
- Unrestricted

TYOLOGY

- Allotments, community gardens and city (urban farms)
- Amenity green space
- Cemeteries and churchyards
- Civic spaces / Waterfront
- Green corridors
- Natural and semi natural urban green spaces
- Outdoor sports facilities
- Parks and gardens; Parks and gardens
- Provision for children and teenagers
- N/A

This map shows the distribution of open spaces in Tower Hamlets and within 1.2km of the borough and identifies the type of open spaces.

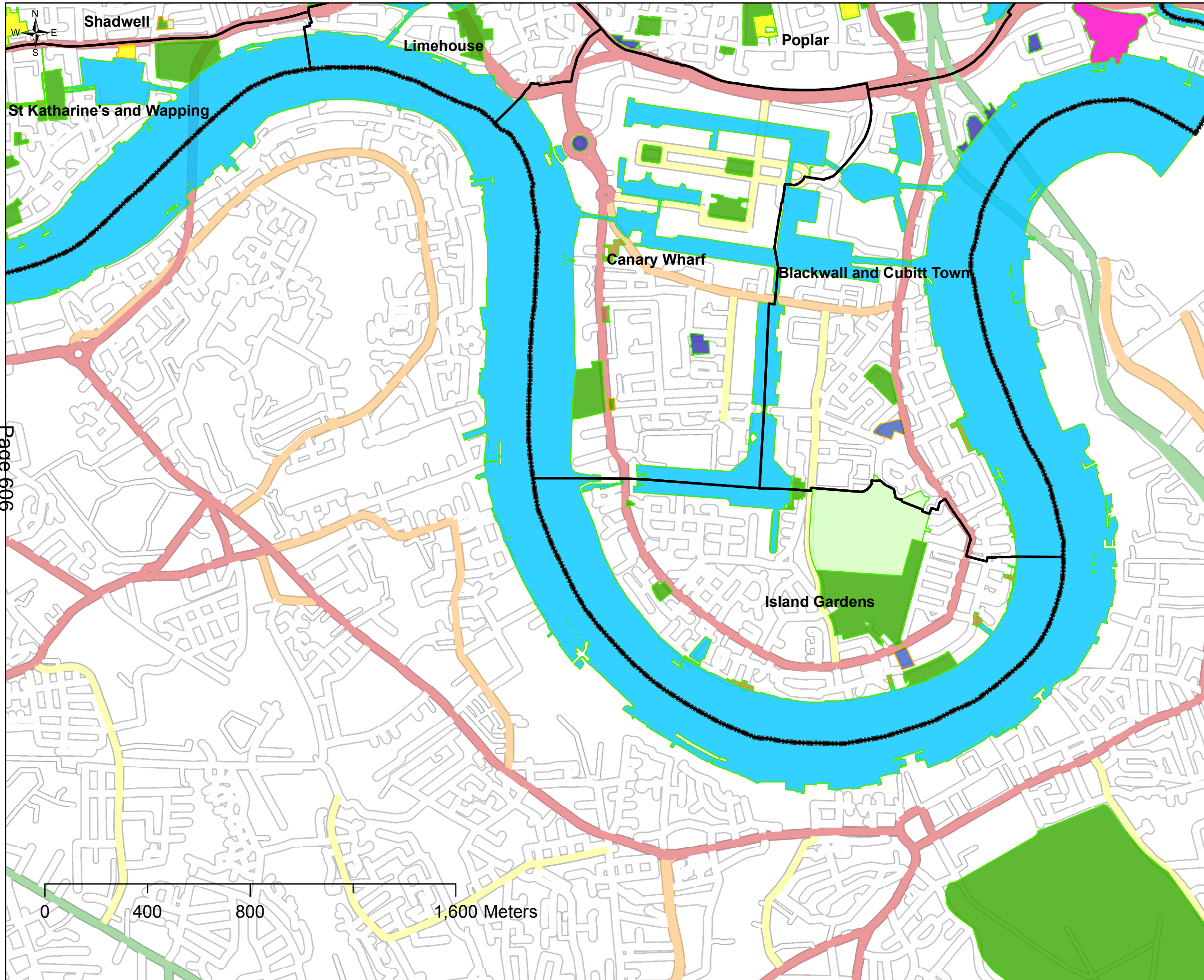
Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
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Map No: 5	Date: 26 Jan 2017
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Scale: 1:30,000 at A3










Tower Hamlets
Open Space Strategy 2017

Places South
Borough Framework Map











Map No: 6

-  LBTH Wards
-  Borough Boundary

ACCESS

-  Partially Restricted
-  Restricted
-  Unrestricted

TYPOLGY

-  Allotments, community gardens and city (urban farms)
-  Amenity green space
-  Cemeteries and churchyards
-  Civic spaces / Waterfront
-  Green corridors
-  Natural and semi natural urban green spaces
-  Outdoor sports facilities
-  Parks and gardens; Parks and gardens
-  Provision for children and teenagers
-  N/A

This map shows the distribution of open spaces in Tower Hamlets and within 1.2km of the borough and identifies the type of open spaces.

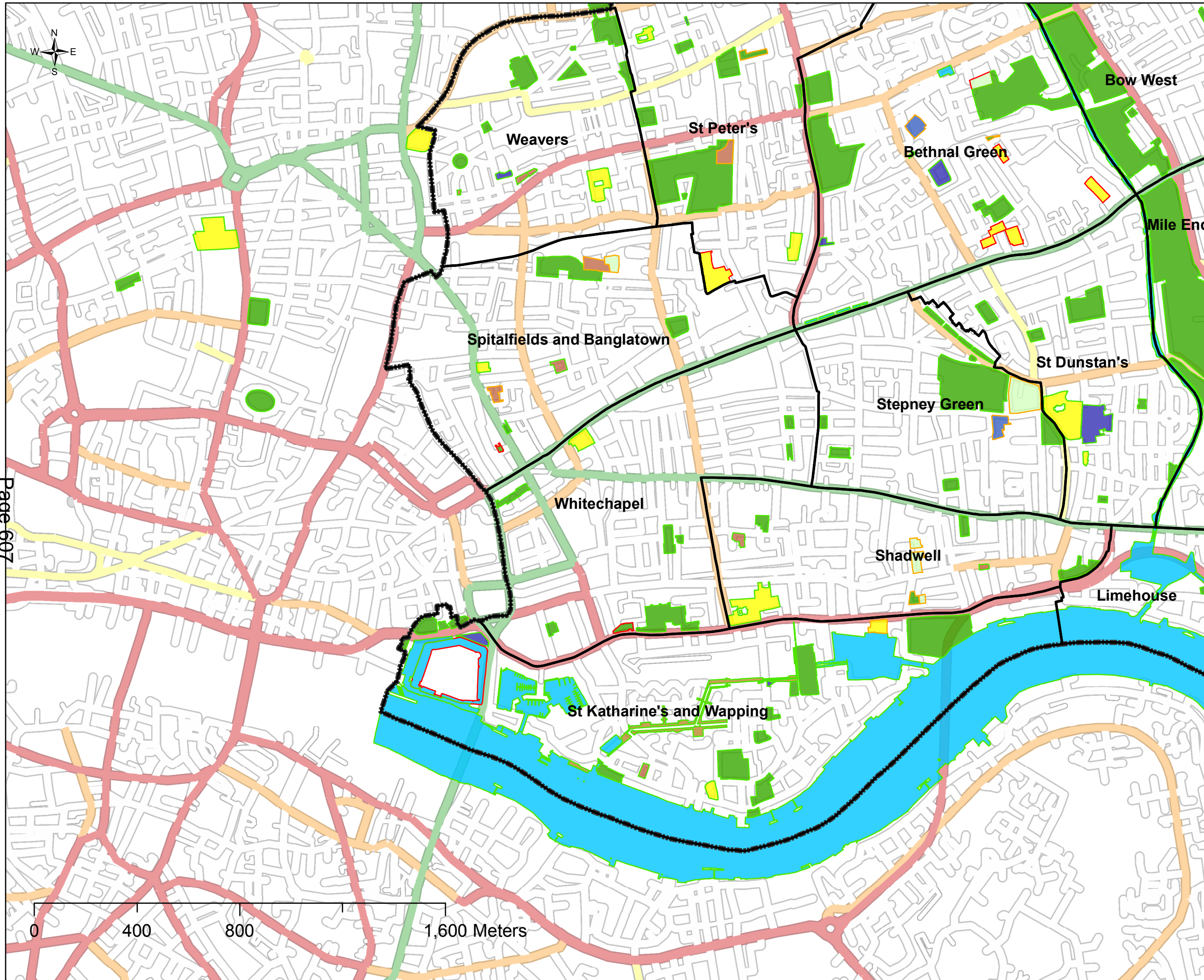
Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
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Map No: 6	Date: 26 Jan 2017	
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Scale: 1:30,000 at A3





Tower Hamlets
Open Space Strategy 2017

Places West
Borough Framework Map

Map No: 7

- LBTH Wards
- Borough Boundary

ACCESS

- Partially Restricted
- Restricted
- Unrestricted

TYOLOGY

- Allotments, community gardens and city (urban farms)
- Amenity green space
- Cemeteries and churchyards
- Civic spaces / Waterfront
- Green corridors
- Natural and semi natural urban green spaces
- Outdoor sports facilities
- Parks and gardens; Parks and gardens
- Provision for children and teenagers
- N/A

This map shows the distribution of open spaces in Tower Hamlets and within 1.2km of the borough and identifies the type of open spaces.

Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
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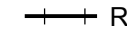

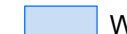

Map No: 7	Date: 26 Jan 2017
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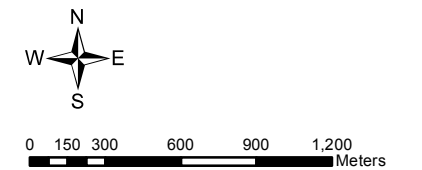
Scale: 1:30,000 at A3



Tower Hamlets
Open Space Strategy 2017

Lines of Severance
Map No: 8

-  Rail
-  Road
-  Waterways
-  Borough Boundary

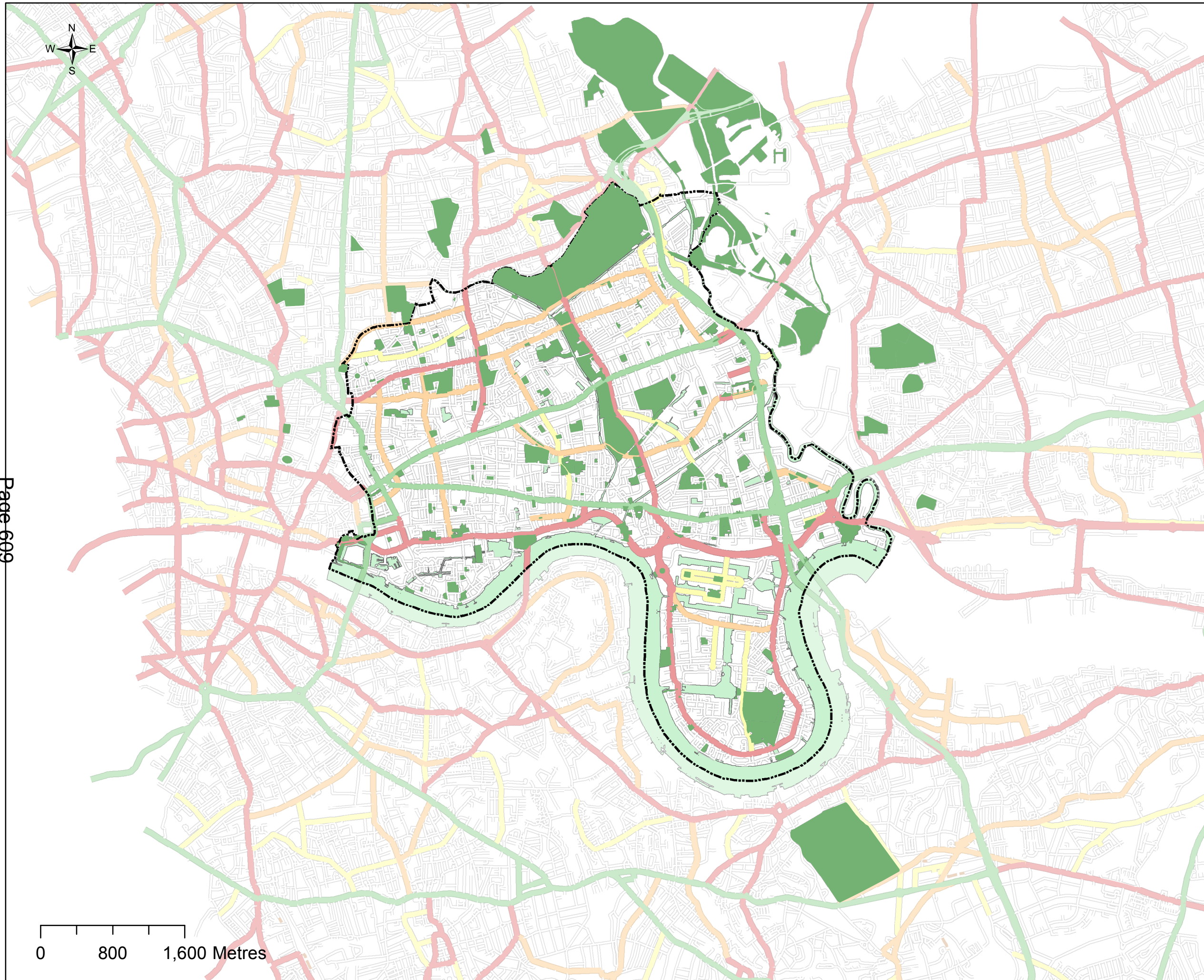


Revised by Governance Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 8	Date: 25 Jan 2017	



Scale: 1:30,000 at A3





Tower Hamlets
Open Space Strategy 2017

Publicly Accessible Open Space
Excluding Water Space
Map No: 9

-  Publicly Accessible Open Spaces
-  Borough Boundary

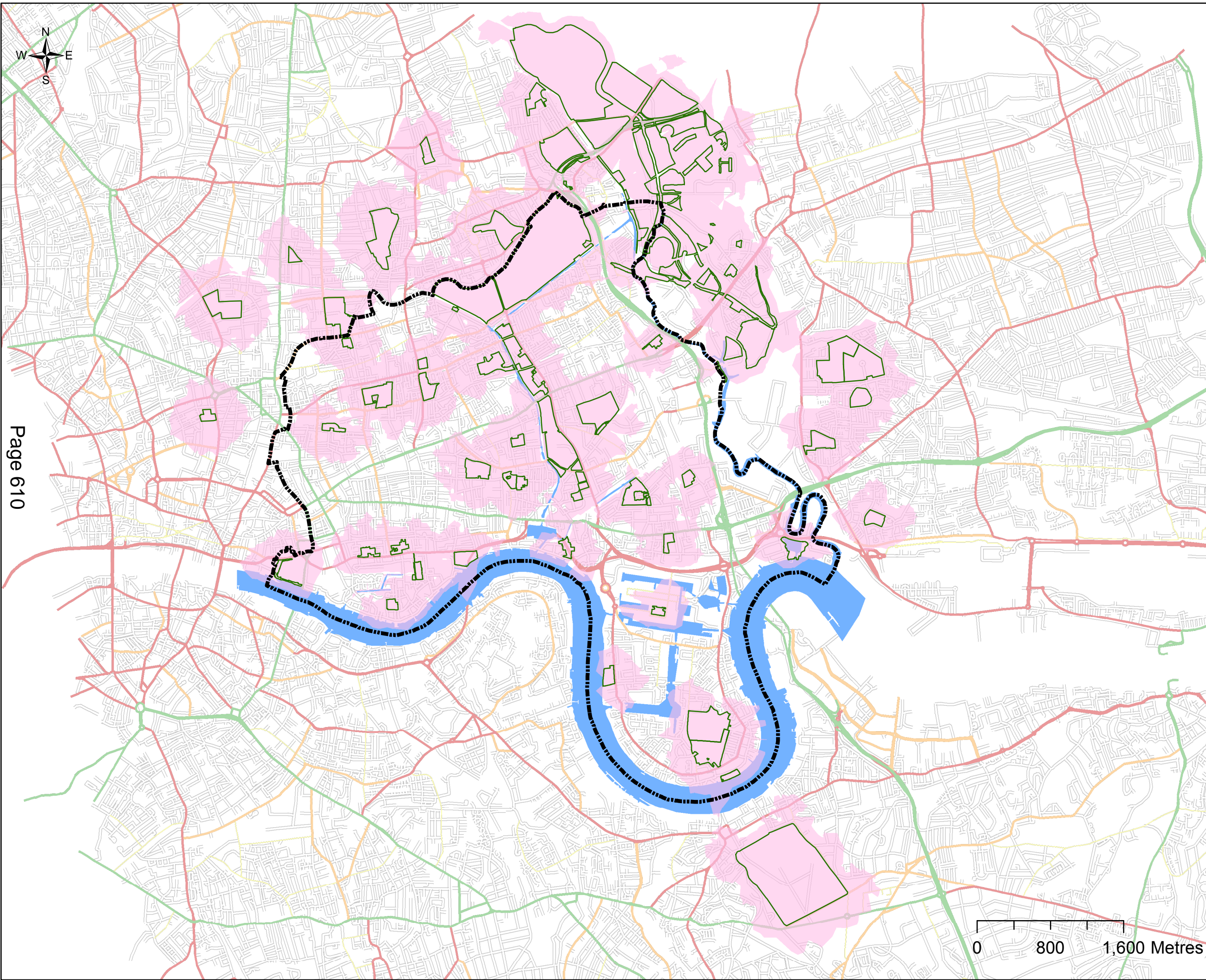
This map shows open spaces which are accessible to the public, according to the definition of publicly accessible contained in the Tower Hamlets Local Plan.

Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 9	Date: 26 Jan 2017	

Scale: 1:30,000 at A3









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Tower Hamlets Open Spaces Strategy 2017

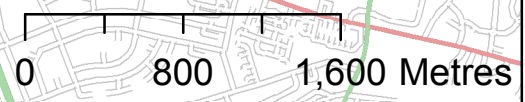
Accessibility to all parks above
1 ha in Tower Hamlets, and
parks above 1 ha within 1.2km
of the borough
Map No : 10

-  Borough Boundary
-  Unrestricted parks
-  5min walking distance
(400m) to open spaces
1+ ha
-  Waterfront

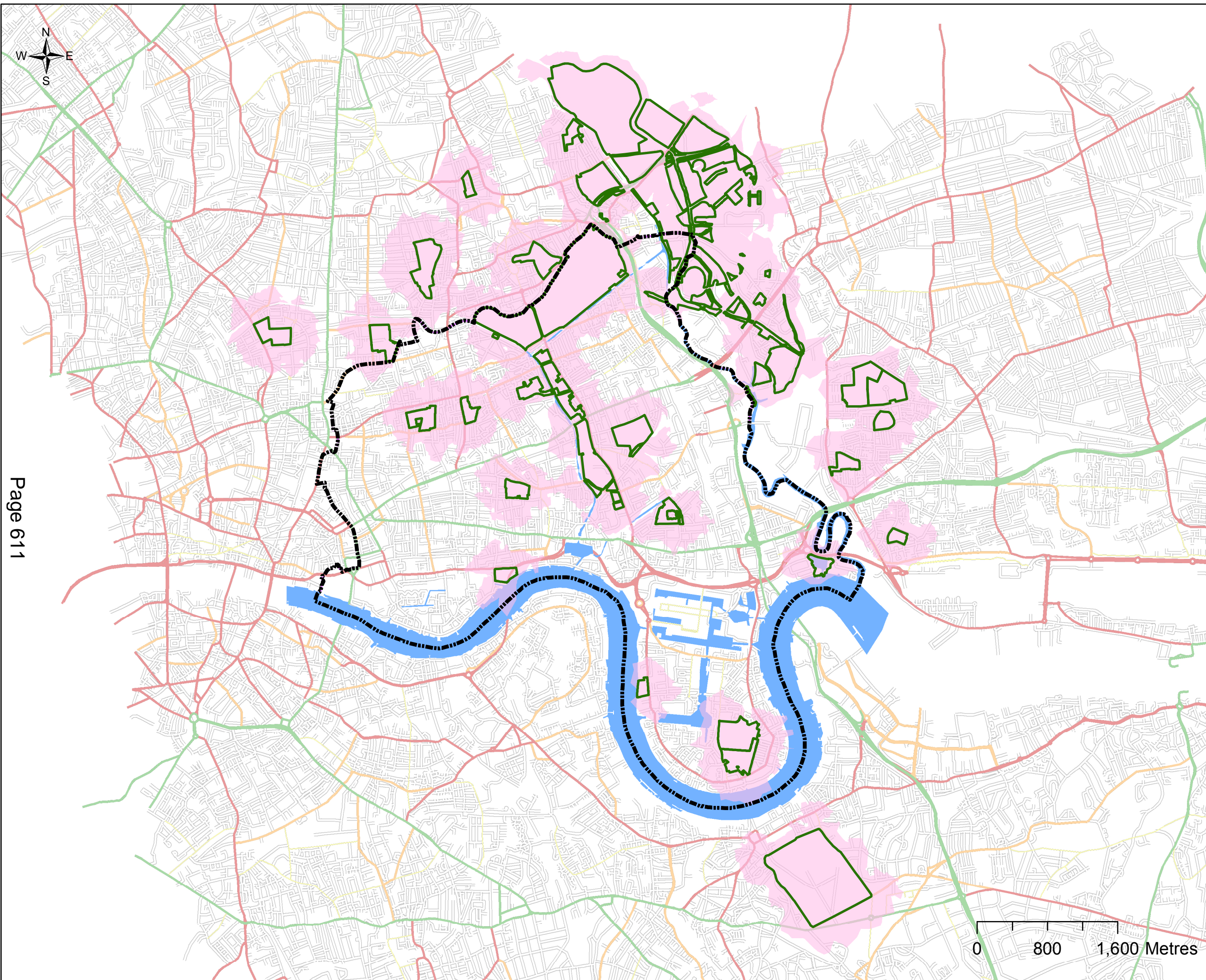
Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 10	Date: 26 Jan 2017	Job No:

Scale: 1:30,000 at A3







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 Tower Hamlets Environment & Culture Strategy Programme Work Stream 100019288
 Open Space Strategy 2017. In-house GIS mapping/CS and data/100019288/Open Space Strategy/3 - Ouedou/100019288



Tower Hamlets Open Spaces Strategy 2017

Accessibility to all parks above
2 ha in Tower Hamlets and
within 1.2km of the borough
Map No : 11

-  Borough Boundary
-  Unrestricted
-  5min walking distance
(400m) to open spaces
2+ ha
-  River and Canals

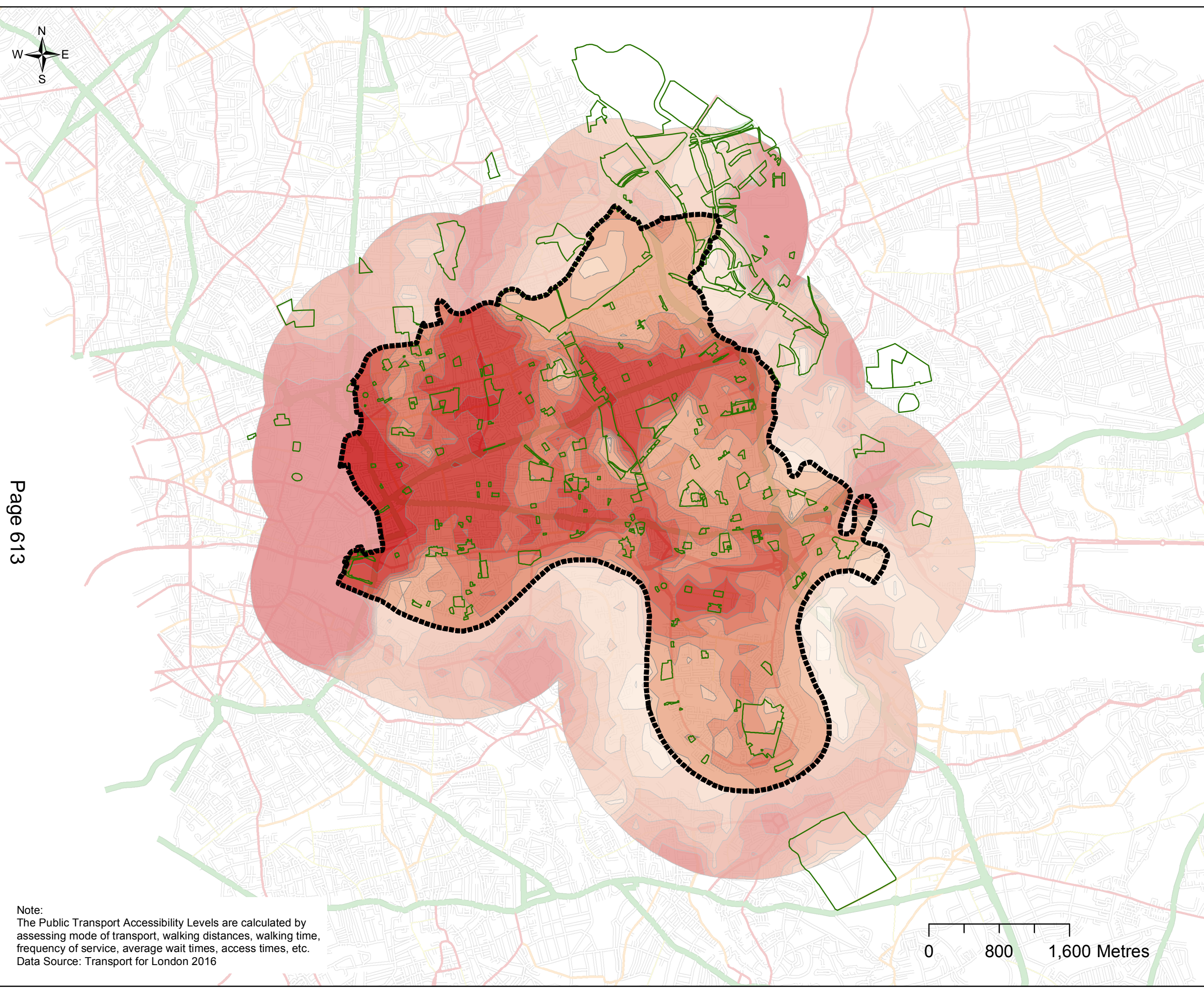
The GLA defines parks above 2ha as local parks. Residents living in parts of the borough shaded in pink are within 400 m or 5min walking distance of a GLA local park.

Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 11	Date: 26 Jan 2017	Job No:

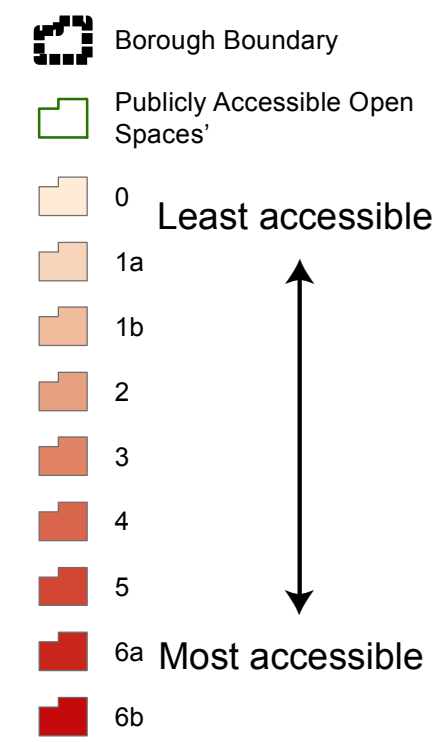
Scale: 1:40,000 at A3





Tower Hamlets Open Space Strategy 2017

Public Transport
Accessibility Levels
Map No: 13



Page 613

Note:
The Public Transport Accessibility Levels are calculated by assessing mode of transport, walking distances, walking time, frequency of service, average wait times, access times, etc.
Data Source: Transport for London 2016



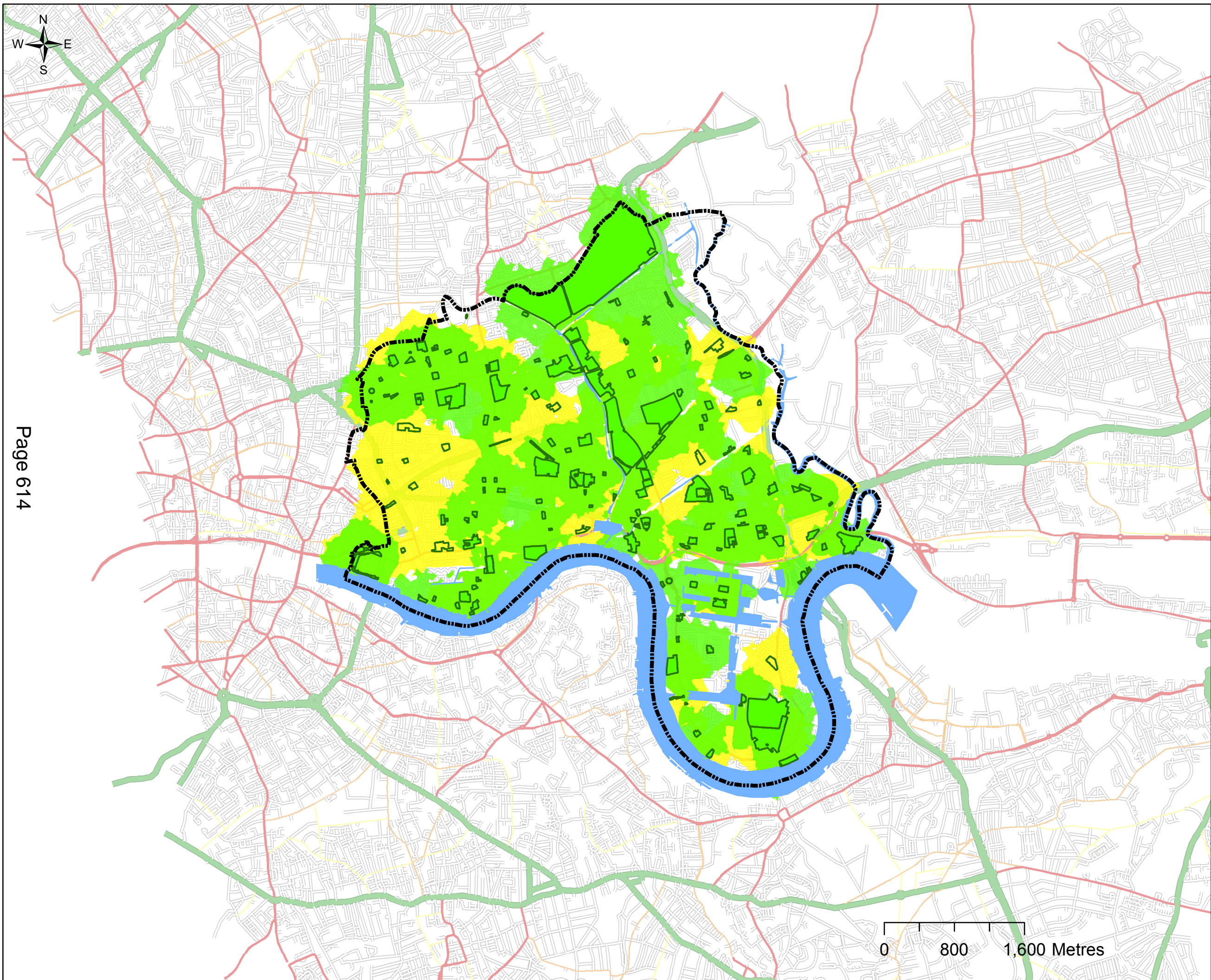
Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 13	Date: 26 Jan 2017	Job No:

Scale: 1:30,000 at A3







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Tower Hamlets Open Space Strategy 2017

Quality of parks and open spaces compared to standards
Map No: 14

-  Borough Boundary
-  Parks and open spaces
-  + Quality Rating
-  - Quality Rating

Map showing whether parks and open spaces in Tower Hamlets are above or below expected quality standards

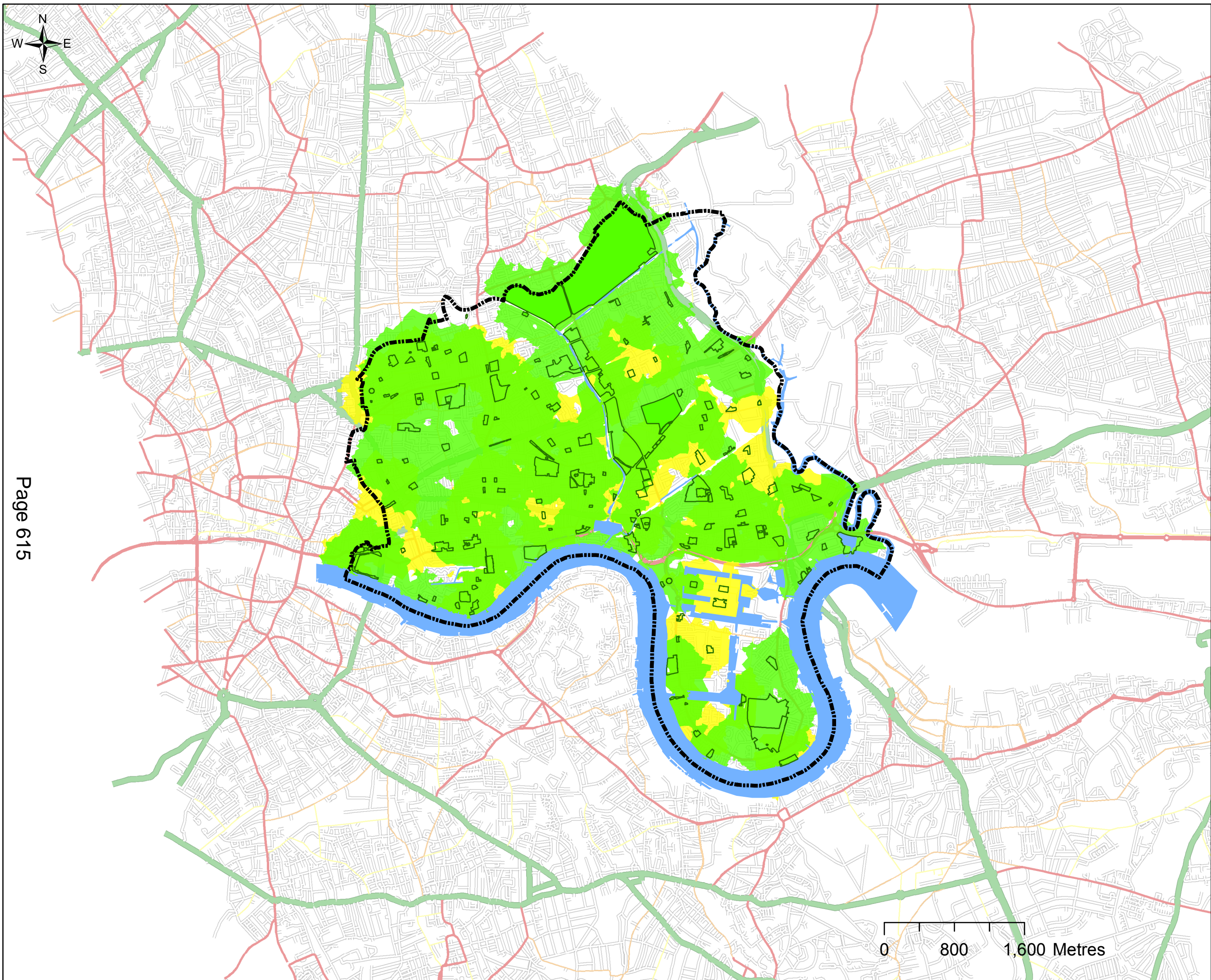
Revised by Governance (LBTH) July 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 14	Date: 26 Jan 2017	Job No:

Scale: 1:40,000 at A3







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 In-house GIS mapping\GIS and data\Final Maps\Open Space Strategy 2017 - Output\Final Maps
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Tower Hamlets Open Space Strategy 2017

Value of parks and open spaces compared to standards
Map No: 15

-  Borough Boundary
-  Parks and open spaces
-  + Value Rating
-  - Value Rating

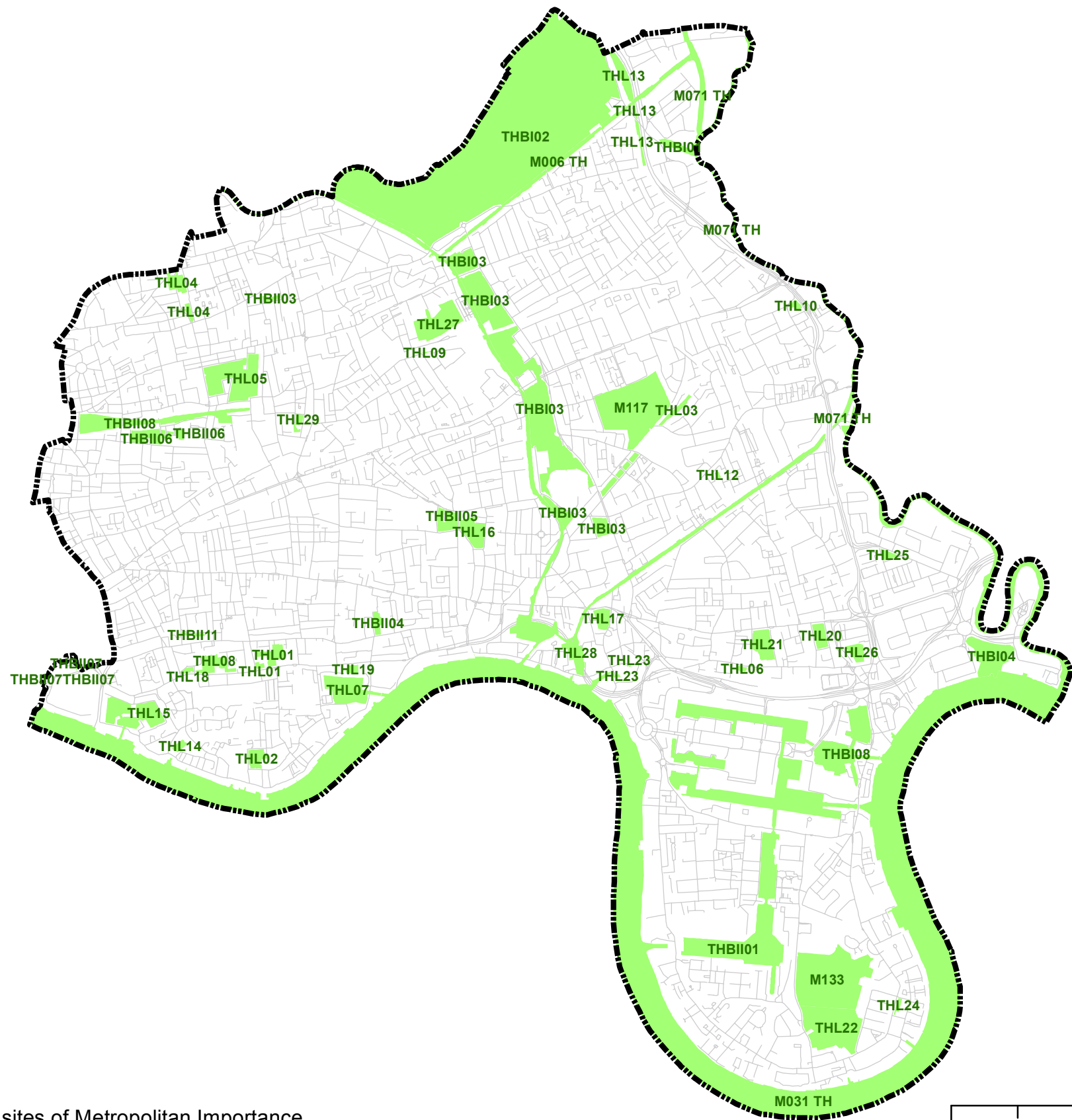
Map showing whether parks and open spaces in Tower Hamlets are above or below expected value standards

Revised by Governance (LBTH) July 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 15	Date: 26 Jan 2017	Job No:

Scale 1 : 40, 000 at A3





Tower Hamlets Open Space Strategy 2017

Sites of Importance for Nature Conservation Map No: 16

- Tower Hamlets Borough Boundary
- Sites of importance for Nature Conservation

Revised by Governance (LBTH) May 2017

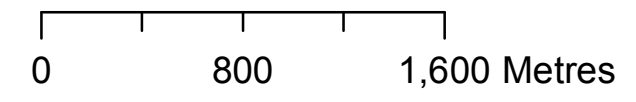
Drawn by: WN	Checked by: KO	Revision: TD
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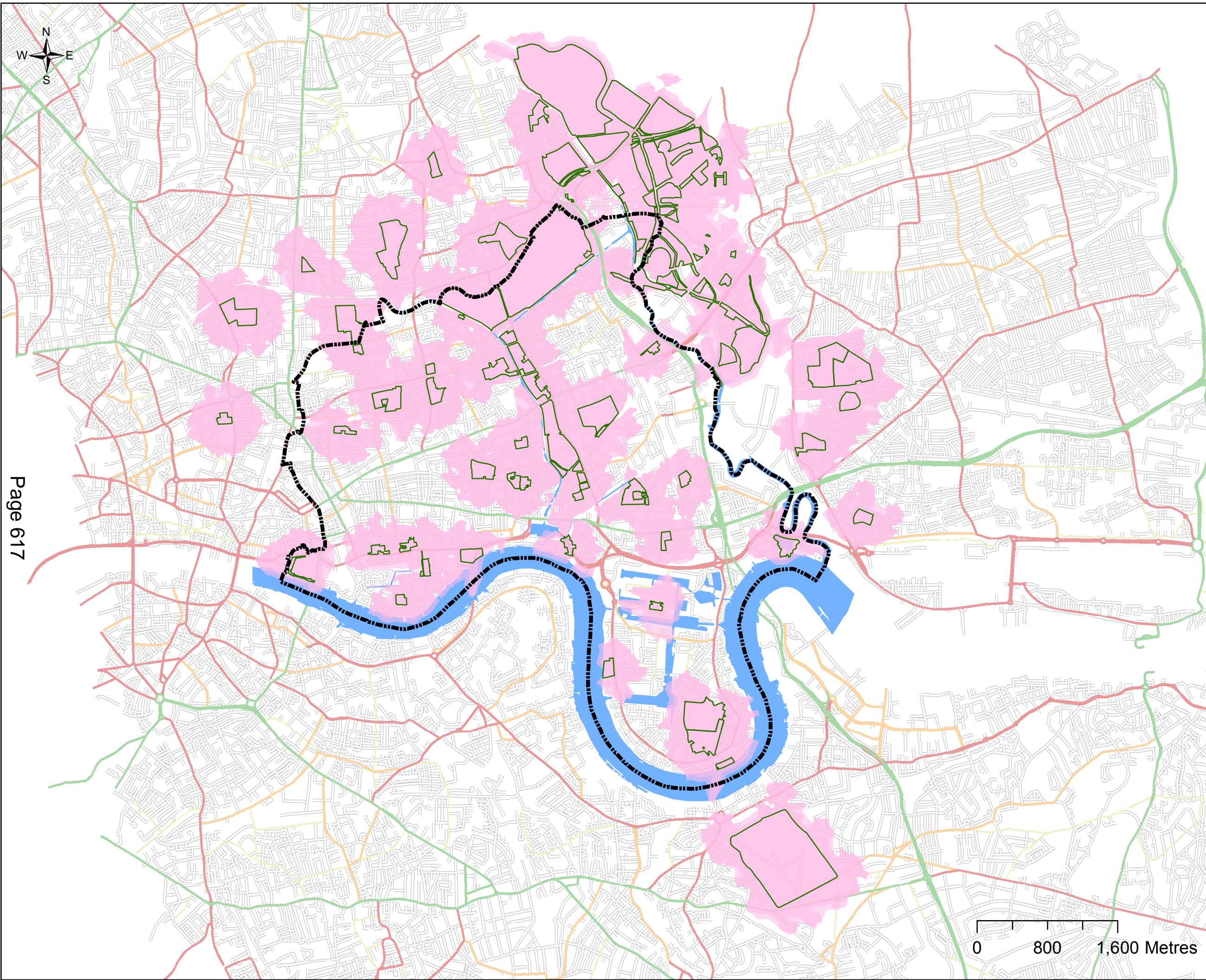
Map No: 16	Date: 25 Jan 2017	
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Scale: 1:30,000 at A3







Notes:
 Sites prefaced by "M" are sites of Metropolitan Importance.
 Sites prefaced by "THB" are sites of Borough Importance divided into two grades I & II.
 Sites prefaced by "THL" are sites of Local Importance.





Tower Hamlets Open Spaces Strategy 2017

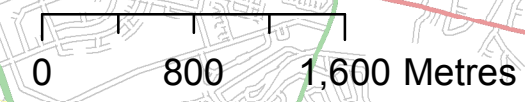
Accessibility to all parks above
1 ha in Tower Hamlets, and
parks above 1 ha within 1.2km
of the borough up to 2030
Map No : 17

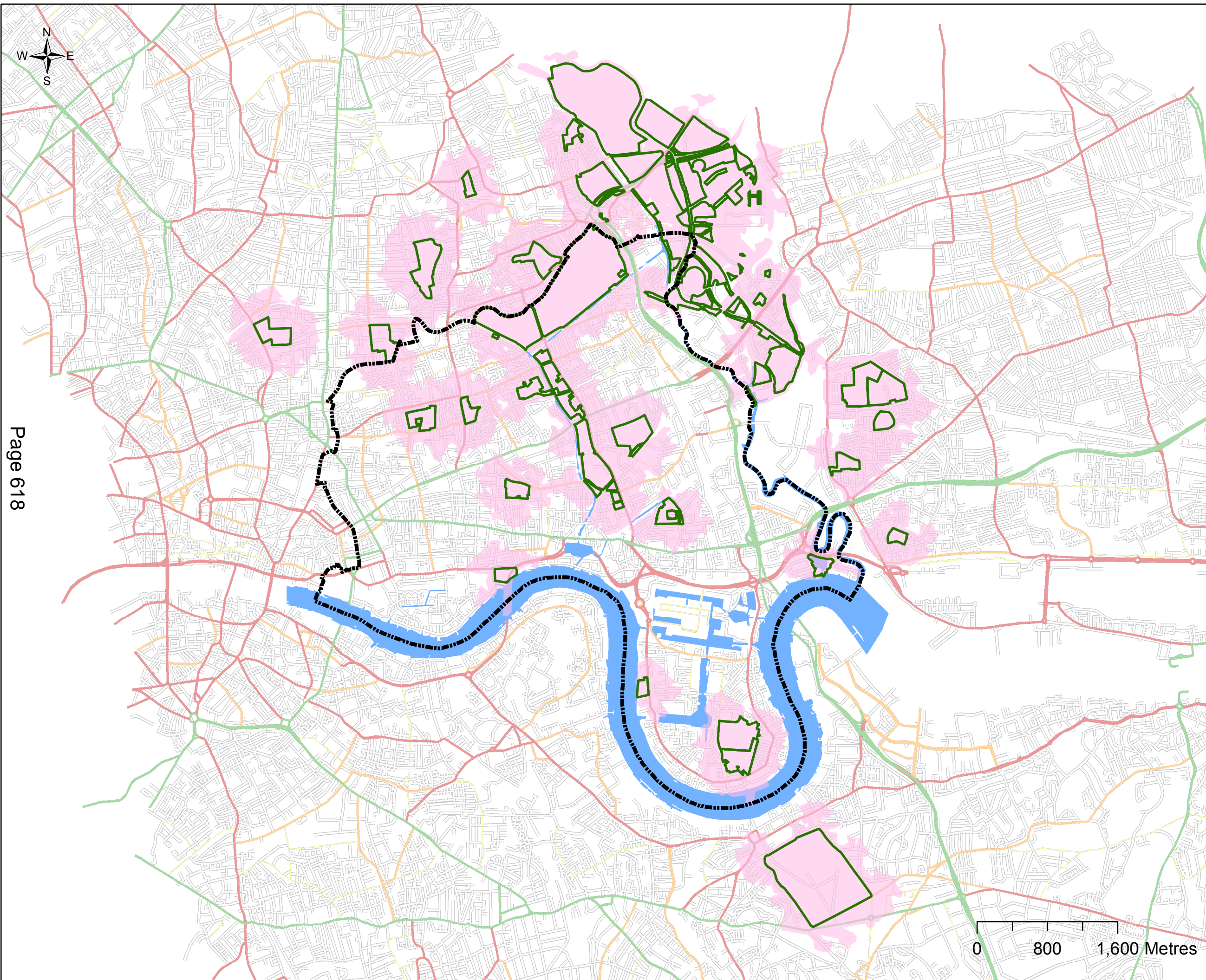
-  Borough Boundary
-  Unrestricted parks
-  5min walking distance
(400m) to open spaces
1+ ha
-  River and Canals

Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 17	Date: 26 Jan 2017	Job No:





Scale: 1:40,000 at A3





Tower Hamlets Open Spaces Strategy 2017

Accessibility to all parks above 2 ha
in Tower Hamlets and within 1.2km
of the borough up to 2030
Map No : 18

-  Borough Boundary
-  Unrestricted
-  5min walking distance (400m) to open spaces 2+ ha
-  River and Canals

The GLA defines parks above 2ha as local parks. Residents living in parts of the borough shaded in pink are within 400 m or 5min walking distance of a GLA local park.

Revised by Governance (LBTH) Jan 2017

Drawn by: WN	Checked by: KO	Revision: TD
Map No: 18	Date: 26 Jan 2017	Job No:

Scale: 1:40,000 at A3



Equality Analysis (EA)

Financial Year
2017/18

Section 1 – General Information (Aims and Objectives)

**See Appendix
A**

Current decision
rating



Open Space Strategy 2017 – 2027

The Open Space Strategy is a high level document and, as such, does not contain decisions related to individual parks and open spaces. The focus of this equalities analysis is therefore equally focussed at the strategic level. It considers borough-wide equalities data about the use and significance of parks and open spaces to different groups of residents.

The purpose of the Open Space Strategy is:

- [A] Managing the impact of population growth on the provision of open spaces
- [B] Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets
- [C] Contributing to sustainable development
- [D] Addressing competing demands on parks and open spaces
- [E] Mitigating the revenue costs for the council of managing and maintaining parks and open spaces in Tower Hamlets

The evidence in the Strategy and the recommended criteria for investment may inform individual decisions impacting specific parks and open spaces. It will be necessary to carry out individual equalities assessments for these decisions, as appropriate and if identified as a result of EA checklist completion.

The Open Space Strategy is expected to be reviewed again in 2022. At this point it would be prudent to review the overall influence of the Open Space Strategy on the creation and improvement of open spaces for that period, and any related equalities implications.

Conclusion - To be completed at the end of the Equality Analysis process

The EA has identified that there is no adverse impact on a particular group. The Open Space Strategy is specifically aimed at reducing inequalities in access to open space and ensuring that all residents can benefit from the positive impacts of open space. The Strategy seeks to foster cohesion by ensuring that open space can continue to be a place for interaction and engagement as demand on space increases from a growing population.

Name: Judith St John – Divisional Director Sport, Culture and Leisure
(signed off by)

Date signed off:
(approved)

Service Area: Governance Directorate

Team Name: Strategy, Policy, Equalities & Partnerships

Service Manager: Thorsten Dreyer

Name and role of the officer completing the EA: Sam Springate (Strategy, Policy and Performance Officer)

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

A range of research activities and studies have informed the Strategy. The following activities were carried out to support the development of this Strategy, and equalities data was captured where possible:

- Culture, Leisure and Open Spaces survey 2016 (a representative telephone survey of Tower Hamlets residents carried out in October/November 2016).
- In-depth focus groups with targeted stakeholder groups, including young people representatives.

Other information sources that informed the Strategy include:

- Budget Review consultations November 2016
- Annual Residents Survey 2016
- Local parks consultations 2016
- Pupil Attitude Survey 2016
- Public Health Community Engagement 2016
- Your Borough, Your Future consultation
- Public Health Joint Strategic Needs Analysis
- HMRC's 'children in a low income' data
- 'Housing Benefit in Tower Hamlets' data

Section 3 – Assessing the Impacts on the 9 Groups

Please refer to the guidance notes below and evidence how you're proposal impact upon the nine Protected Characteristics in the table on page 3?

For the nine protected characteristics detailed in the table below please consider:

- **What is the equality profile of service users or beneficiaries that will or are likely to be affected?**

Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups

- **What qualitative or quantitative data do we have?**

List all examples of quantitative and qualitative data available
(include information where appropriate from other directorates, Census 2001 etc)

- Data trends – how does current practice ensure equality

- **Equalities profile of staff?**

Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are not directly employed by the council.

- **Barriers?**

What are the potential or known barriers to participation for the different equality target groups? Eg- communication, access, locality etc.

- **Recent consultation exercises carried out?**

Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires undertaken etc. Focus in particular on the findings of views expressed by the equality target groups. Such consultation exercises should be appropriate and proportionate and may range from assembling focus groups to a one to one meeting.

- **Additional factors which may influence disproportionate or adverse impact?**

Management Arrangements - How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups

- **The Process of Service Delivery?**

In particular look at the arrangements for the service being provided including opening times, custom and practice, awareness of the service to local people, communication

Please also consider how the proposal will impact upon the 3 One Tower Hamlets objectives:-

- Reduce inequalities
- Ensure strong community cohesion
- Strengthen community leadership.

Please Note -

Reports/stats/data can be added as Appendix

Target Groups	Impact – Positive or Adverse	Reason(s) Please also how the proposal will promote the three One Tower Hamlets objectives? -Reducing inequalities -Ensuring strong community cohesion -Strengthening community leadership
Race	Positive	<p>Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present an opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about eliminating discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live, work and study in the borough.</p> <p>The results of the Culture, Leisure and Open Spaces survey 2016 (the telephone survey) show that the respondents' satisfaction with the borough's parks and open spaces is high across different ethnic groups. The Strategy aims to maintain the high satisfaction of this group through improving the existing parks and open spaces.</p>
Disability	Positive	<p>Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present an opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about eliminating discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live, work and study in the borough.</p> <p>The results of the Culture, Leisure and Open Spaces survey 2016 (the telephone survey) show that the level of this group's satisfaction with the borough's parks and open spaces was very close to the one of all the respondents. The Strategy aims to maintain the high satisfaction of this group through improving the existing parks and open spaces. The quality and value audit of open spaces in the borough considered physical access to</p>

		sites and, for each site, identifies potential access improvements.
Gender	Positive	<p>Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present an opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about eliminating discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live, work and study in the borough.</p> <p>The results of the Culture, Leisure and Open Spaces survey 2016 (the telephone survey) show that both male and female respondents were highly satisfied with the borough's parks and open spaces. The Strategy aims to maintain the high satisfaction of this group through improving the existing parks and open spaces.</p> <p>The Health and Wellbeing Strategy states that the average life expectancy of females in the borough was 8% lower than the national average and 10% lower for males. Parks and open spaces were cited as a valuable tool in increasing healthy outcomes leading to greater life expectancy.</p> <p>The quality and value audit of open spaces in the borough considered security and the perception of safety, which can be particularly important to some people sharing protected characteristics. Safety and security improvement recommendations are contained in the site reports.</p>
Gender Reassignment	Positive	<p>Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present an opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about eliminating discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live, work and study in the borough, although we do not have conclusive data of this group.</p> <p>The quality and value audit of open spaces in the borough considered security and the perception of safety, which can be particularly important to some people sharing protected characteristics. Safety and security improvement</p>

		recommendations are contained in the site reports.
Sexual Orientation	Positive	<p>Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present and opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about elimination discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live, work and study in the borough, although we do not have conclusive data of this group.</p> <p>The quality and value audit of open spaces in the borough considered security and the perception of safety, which can be particularly important to some people sharing protected characteristics. Safety and security improvement recommendations are contained in the site reports.</p>
Religion or Belief	Positive	<p>Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present and opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about elimination discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live, work and study in the borough.</p> <p>The results of the Culture, Leisure and Open Spaces survey 2016 (the telephone survey) show that the respondents' satisfaction with the borough's parks and open spaces is high across different religious groups. The Strategy aims to maintain the high satisfaction of this group through improving the existing parks and open spaces.</p> <p>The quality and value audit of open spaces in the borough considered security and the perception of safety, which can be particularly important to some people sharing protected characteristics. Safety and security improvement recommendations are contained in the site reports.</p>
Age	Positive	Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present and opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which

		<p>may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about elimination discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live, work and study in the borough.</p> <p>The results of the Culture, Leisure and Open Spaces survey 2016 (the telephone survey) show that the respondents' satisfaction with the borough's parks and open spaces is high across different age groups. The Strategy aims to maintain the high satisfaction of this group through improving the existing parks and open spaces.</p> <p>The Pupil Attitude Survey found that boys were more active than girls before school, during break times and after school (out of a sample size of 2,647). Going to a park is the second most popular activity for 65% of primary school children (out of sample size of 1,247) and 59% of Secondary school children (out of sample size of 1,808), making it the second most popular choice after reading.</p> <p>The data for HMRC's 'children in a low income' measure, showed Tower Hamlets as having 24% more children in poverty than the national average and 18% more than the London average. The Housing Benefit data for Tower Hamlets shows that half of the borough's children live in families who receive Housing Benefit.</p> <p>The Health and Wellbeing Strategy advised that Tower Hamlets has significantly more underweight and overweight children than the national average, as well as widespread vitamin D deficiency due to a lack of sunshine. They advised that parks and play areas within parks have a crucial role in improving on both figures.</p> <p>The quality and value audit of open spaces in the borough considered security and the perception of safety, which can be particularly important to some people sharing protected characteristics. Safety and security improvement recommendations are contained in the site reports.</p>
Marriage and Civil Partnerships.	Positive	<p>Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present and opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about elimination discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live,</p>

		<p>work and study in the borough, although we do not have conclusive data of this group.</p> <p>The quality and value audit of open spaces in the borough considered security and the perception of safety, which can be particularly important to some people sharing protected characteristics. Safety and security improvement recommendations are contained in the site reports.</p>
Pregnancy and Maternity	Positive	<p>Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present and opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about elimination discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live, work and study in the borough, although we do not have conclusive data of this group.</p>
Other (Socio-economic and carers)	Positive	<p>Open spaces are a resource accessible to all residents of the borough free at the point of use. Due to their nature as public space, open spaces and parks present and opportunity for bringing together people from different backgrounds. Increasing population density in Tower Hamlets will place increasing demand on open space, which may have negative impacts on community cohesion. The Strategy identifies investment priorities for improving existing parks and open spaces. It also identifies locations for the creation of new open space based on careful analysis of areas of the borough where residents are experiencing open space deficiency. Areas of open space deficiency may have higher concentrations of people sharing specific protected characteristics. However, demographic data is not sufficiently detailed to draw specific conclusions. By prioritising how to invest, recognising the demands from different user groups and seeking to close gaps in deficiency, the Strategy is intrinsically about elimination discrimination, fostering cohesion and advancing equality of opportunity. It aims to benefit all who live, work and study in the borough, although we do not have conclusive data of this group.</p>

Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence or view that suggests that different equality or other protected groups (including staff) could be adversely and/or disproportionately impacted by the proposal?

Yes? No? ✓

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added / removed?

(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. An EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)

Where you believe the proposal discriminates but not unlawfully, you must set out below your objective justification for continuing with the proposal, without mitigating action.

n/a

Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes? ✓ No?

How will the monitoring systems further assess the impact on the equality target groups?

Reviewing information from the Annual Residents Survey

Does the policy/function comply with equalities legislation?
(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes? ✓ No?

If there are gaps in information or areas for further improvement, please list them below:

As discussed at the start of this document, when the Open Space Strategy is next reviewed it may be prudent to consider the overall influence of the Open Space Strategy on the creation of new spaces and the improvement of existing ones and how this impacts on gaps in provision. There is currently insufficient data to underpin this type of review. Consideration should be given to addressing this gap, as this type of performance information is one way to systematically understand the impact of the Strategy on equalities groups. However, as parks and open spaces are free to access such data will always be based on sampling and surveys.

How will the results of this Equality Analysis feed into the performance planning process?

Equalities data is captured, where possible, in our resident feedback (e.g. Annual Residents survey) so it can be analysed for performance purposes.


Section 6 - Action Plan

*As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.*

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Ensure that equalities data continues to be captured as practicable in the context of a free to access service	Ensure that equalities data continues to be captured as practicable in the context of a free to access service	Ongoing	Head of Arts, Park & Events	

Appendix A

Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, the Open Space Strategy does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 



Consultation on Business Rates Relief

**2017 Revaluation
Discretionary Relief for Non-Domestic Rates**

September 2017

Consultation on business rates relief in LBTH – Revaluation Support

Tower Hamlets Council wants to consult with residents, business and the Greater London Authority on developing a new business rates relief scheme for revaluation support.

This document:

- explains what business rates and business rates relief for revaluation support are
- explains why we want to develop a new relief scheme for revaluation support
- sets out options and proposals for the new scheme

We would welcome your views on these proposals and encourage as many responses as possible.

Please note that as the amount provided by the government is a fixed sum and any changes made to the criteria as a result of this consultation will result in a change to the amount of relief that will be awarded to individual ratepayers.

The consultation can be completed by answering the questions on the web for at the following link:

www.pleaseinsertlink.co.uk

The consultation period will run from: XXXXXXXX 2017 to XXXXXXXX 2017

Background Summary

As part of the Budget on 8 March 2017, the Chancellor announced that the Government would make available a discretionary fund of £300 million over four years from 2017-18 to support those businesses that face the steepest increases in their business rates bills as a result of the revaluation.

The intention is that every billing authority in England will be provided with a share of the £300 million to support their local businesses. This will be administered through billing authorities' discretionary relief powers under section 47 of the Local Government Act 1988.

The Government believes that councils are best placed to judge the particular circumstances of local ratepayers and direct the funding where it is most needed to support local economies. The Government will allocate the available funding to each council area based on assumptions about how authorities will target their relief scheme.

The Council has been allocated the fifth largest amount nationally of £8.184m over four years which reduces substantially year on year as shown in the following table, with no relief being funded for the final year of the rating list.

Gross Increase in Bills from 16/17 to 17/18	Amount of Discretionary Relief Available					Total
	2017/2018	2018/2019	2019/2020	2020/21	2021/2022	
£40,567,000	£4,774,000	£2,319,000	£955,000	£136,000	£0.00	£8,184,000

This consultation is about options for the Council to design a business rates relief scheme for 'revaluation support' using the Government's allocation of funding to the borough.

By going out to consultation with ratepayers and representative groups this will help inform and shape options for the design of the new relief scheme for revaluation support locally.

Proposal and options for consultation

Our proposal is to offer relief for revaluation support to those businesses and organisations that are facing a sizeable increase in their business rate bills following the April 2017 revaluation.

Businesses whose bills have decreased or remain the same following the revaluation or after applying eligibility for other relief schemes would not be eligible for the extra relief for revaluation support.

We estimate that the Council's allocation of funding from the Government to provide extra relief for revaluation support could be used to offer financial assistance to more than 3,600 ratepayers within the borough following large increases in their business rate liabilities.

The overall changes can be categorised as follows –

Properties Over £200,000 RV	1,021
Properties with a decrease in rateable value	3,395
Properties with no change in rateable value	2,294
Empty Properties	1,439
Properties with a rateable value Below £12,000	2,617
Public or National Organisations	1,683
Properties identified as qualifying for Relief	3,607
Total	16,056

The funding for the scheme was determined by Government based on the national increases for properties with a rateable value of less than £200,000 where the value of the increase exceeds 12.5%. Since the upper rateable value of £200,000 was used by the Government for funding purposes we have used this in our calculations as part of the general criteria for the relief.

Although the Government used the increase of 12.5% to calculate the level of funding to Tower Hamlets, we propose to grant the relief to all eligible ratepayers whose increase in rateable value has been more than £100.00. This change will boost the number of ratepayers benefiting from the relief by a further 2,000 cases.

The Government also made it clear that the relief should be aimed at supporting local economies and that state aid rules would apply when making any award of the relief. We have therefore excluded any company or other organisation with multiple rate accounts (three or more) that operates within or outside of the borough and also any public body that is listed as the ratepayer.

The relief will only be available for those organisations that were in occupation of the property on or before the 31st March 2017 and the property appeared in the 2010 Local Rating list as at the 31st March 2017 and also appeared in the 2017 Local Rating List as at 1st April 2017.

In order to qualify for the relief the property must remain occupied from the 31st March 2017 and as soon as the property becomes vacant the relief will cease with effect from the date of vacation.

The amount of relief that is awarded will be amended where a qualifying ratepayer's 2017-2018 and, or 2016-2017 rates bill is amended for any of the following reasons, the amount of their relief will be reduced or removed accordingly:

- A change in rateable value in the 2010 and, or 2017 rating lists
- The provision of a certificated value for the 2010 rating list or historical change
- The application of any additional rate relief or exemption
- Any other adjustment to their liability

The relief will be calculated after any other exemptions and relief have been awarded and before the application of the Business Rate Supplement.

The amount of relief will be fixed for the four year period and eligibility is determined based on a fixed list which has been extracted from the Council's Revenues system as at the 1st April 2017. This ensures that the amount of relief provided to ratepayers is maximised and kept within the allocation of resources provided by the Government.

The relief will not be provided to ratepayers where the actual increase is less than £100 as this the cost to administer the relief would outweigh the award.

Any organisation that qualifies for the Small Business Rate Support Scheme which caps any limit to a maximum of £50.00 per month or £600.00 a year will be excluded from receiving the relief.

Organisations will not be required to complete an application form as the relief will be awarded automatically by the Council based on the qualifying criteria established. Ratepayers that are not awarded the relief can ask for a review of their circumstances to see if they are eligible to receive the relief.

Option 1 - Fixed Amount

A fixed amount is provided to each ratepayer depending on the actual amount of the increase as at the 1st April 2017. The increase is calculated by comparing the charge amount less any reliefs or exemptions for 2016-2017 against the same calculation for 2017-2018.

The following table shows the amount of relief that can be provided based on the percentage of increase they have experienced as a result of the revaluation. The allocations are based on the total amount of funding available each year from the Government and the number of ratepayers that could be entitled to the relief.

A comparison is also shown where the annual increase exceeds £600 which is in line with the proposed relief provided by the Government for Small Business Rate payers. The estimates shown in years one to four are based on the amounts published by the Government as being made available to LBTH.

Percentage of Increase	Year One ¹	Year Two ¹	Year Three ¹	Year Four ¹	Number of Ratepayers that would benefit
Any	£5,000.00	£1,100.00	£300.00	£35.00	3,607
5% +	£5,500.00	£1,100.00	£320.00	£37.50	3,523
7.5% +	£8,000.00	£1,700.00	£625.00	£80.00	1,612
10% +	£9,000.00	£1,800.00	£650.00	£90.00	1,513
12.5% +	£15,000.00	£2,400.00	£800.00	£100.00	1,214
15% +	£26,500.00	£4,000.00	£1,500.00	£175.00	726
£600 increase	£7,000.00	£1,550.00	£550.00	£80.00	1,619
Total Spend	£4,472,515.62	£2,253,124.02	£908,181.18	£125,091.85	£7,758,912.67
Tolerance	£301,484.38	£65,875.98	£46,818.82	£10,908.15	£425,087.33
Total Fund	£4,774,000.00	£2,319,000.00	£955,000.00	£136,000.00	£8,184,000.00

Awarding a fixed amount is consistent with other schemes introduced by the Government such as the Retail Relief scheme and more recently the proposed scheme for Pubs. This would be simpler for the authority to administer by paying a fixed amount for each ratepayer regardless of the size of the rateable value or the increase experienced by each ratepayer.

The disadvantage to making a fixed award is that it will benefit more those ratepayers with smaller rateable values and smaller increases following the revaluation. For example the largest loser based on the general criteria had a 2016 rateable of 111,000 and would be £26,630.84 worse off after taking into account any reliefs granted.

This equates to a 46% increase in the amount payable and an award of £5,500.00 would represent 18.7% of the increased amount. When compared to a ratepayer that had a rateable value of 61,000 that would be £4,998.29 this equates to an increase of 15.85% in the amount payable which is a third of the increase for the larger ratepayer. If a fixed award of £5,500.00 is made this would mean that the ratepayer is fully compensated for any increase within the first year.

¹ This is the maximum amount that ratepayers can receive based on their actual increase experienced at the time of revaluation. The fixed amount is capped to the upper limit and where the increase is less than this amount the maximum award will be the actual increase experienced.

Option 2 – Percentage Based on Increase

The relief is based on a percentage of the actual amount of the increase as at the 1st April 2017. The increase is calculated by comparing the charge amount less any reliefs or exemptions for 2016-2017 against the same calculation for 2017-2018.¹¹

The following table shows the amount of relief that can be provided based on the percentage of increase they have experienced as a result of the revaluation. The allocations are based on the total amount of funding available each year from the Government and the number of ratepayers that could be entitled to the relief.

A comparison is also shown where the annual increase exceeds £600 which is in line with the proposed relief provided by the Government for Small Business Rate payers. The estimates shown in years one to four are based on the amounts published by the Government as being made available to the Council.

Percentage of Increase	Year One ²	Year Two ²	Year Three ²	Year Four ²	Number of Ratepayers that would benefit
Any	68.00%	33.00%	13.50%	2.00%	3607
5% +	69.00%	34.00%	14.00%	2.00%	3523
7.5% +	75.00%	38.00%	16.00%	2.00%	1612
10% +	77.50%	38.00%	16.00%	2.20%	1513
12.5% +	86.00%	42.00%	17.00%	2.40%	1214
15% +	100.00%	50.00%	20.00%	2.90%	726
£600 Increase	75.00%	36.00%	15.00%	2.10%	1619
Total Spend	£4,302,856.84	£2,088,151.11	£854,243.64	£126,554.61	£7,371,806.20
Tolerance	£471,143.16	£230,848.89	£100,756.36	£9,445.39	£812,193.80
Total Fund	£4,774,000.00	£2,319,000.00	£955,000.00	£136,000.00	£8,184,000.00

Awarding a percentage of any increase means that all ratepayers are treated equally and compensated consistently dependant on the amount of increase that they have experienced. This means that all eligible ratepayers proportionally receive the same amount of assistance and relief.

² This is the maximum amount that ratepayers can receive based on their actual increase experienced at the time of revaluation

QUESTION 1

Before you undertake this consultation please tell us a little about yourself:

Are you a:

Resident of Tower Hamlets

If so please tell us the area of the borough you live in or postcode (optional)

.....

OR

A company, business, representative group or organisation

If so please tell us about the type of business activities and services that you provide (optional)

.....

A representative of the Greater London Authority

QUESTION 2

Which option do you think that the council should adopt?

Option 1 – Fixed amount

Option 2 – Percentage of Increase

Please tell us the reason for this

QUESTION 3

Do you support the proposal to exclude ratepayers that have three or more accounts both within and outside of the borough?

Strongly agree

Agree

Unsure

Disagree

Strongly disagree

Please tell us the reason for this

QUESTION 4

Do you agree that the amounts are fixed for the four year period based on the actual increases identified as at 01 April 2017?

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree

Please tell us the reason for this

QUESTION 5

Do you support the proposal of excluding ratepayers where the increase experienced is £100.00 or less?

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree

Please tell us the reason for this

QUESTION 6

Do you support the proposal to exclude ratepayers that are in receipt of the new Supporting Small Business Relief?

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree

Please tell us the reason for this

QUESTION 7

Do you think that certain categories of business should be excluded from the scheme, such as -

- Payday Lenders
- Betting Shops
- Public Sector and Local Government buildings
- Housing Association properties
- Properties which are unoccupied

Please list any other types of business you feel should be excluded

QUESTION 8

Do you support the proposal of the council identifying eligible ratepayers and applying the relief without the need for them to complete an application form unless in exceptional circumstances?

Strongly agree

Agree

Unsure

Disagree

Strongly disagree

Please tell us the reason for this

QUESTION 9

We would welcome your views or ideas on what you think should be included or excluded from the proposed scheme.

Please tell us any suggestions that you have

QUESTION 10

Business Rates Workshops –

The Council will be holding quarterly workshops for interested ratepayers in the borough which will deal with all aspects of business rates. These sessions are intended to be interactive and provide expert advice on all business rate matters and provide a platform for specific questions from ratepayers.

If you are interested in attending any of these sessions please register by sending an email to ndrconsult@towerhamlets.gov.uk and provide the following information –

1. Your name	
2. Your contact telephone number	
3. The name of the organisation that you represent	
4. The total number people employed in your organisation	
5. The total number of people employed by you living in Tower Hamlets	

In advance of the first workshop we will advise all registered organisations of the time, date and venue.



**Development Viability Supplementary
Planning Document**

September 2017

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1. Introduction

Purpose of this Supplementary Planning Document

- 1.1. This Supplementary Planning Document (SPD) provides guidance as to how Development Plan policies should be applied in a development viability context when determining planning applications. It aims to provide greater clarity to both applicants and the general public and ensures that the principles of sustainable development are at the forefront of decision-making in Tower Hamlets.
- 1.2. This SPD is not planning policy but is guidance that supports the Local Plan by providing further detail on how we will implement our planning policies where viability is an issue. It is therefore a material consideration dependent on the circumstances of individual planning applications.
- 1.3. This SPD will ensure the assessment of the viability of planning applications is efficient, consistent and transparent, and will help to avoid delays in the decision making process.
- 1.4. It sets out how the Council will consider viability in accordance with the National Planning Policy Framework (NPPF), whilst ensuring for the basis of planning decisions in Tower Hamlets.
- 1.5. This SPD has been formed to be consistent with the adopted and emerging Local Plans.

How this SPD has been formed

- 1.6. The viability guidance set out in this SPD has been formed to take account of the Development Plan. In particular:
 - The NPPF;
 - Planning Practice Guidance associated with the NPPF;
 - The London Plan
 - Tower Hamlets' Local Plan. It has also been formed to be consistent with the Council's emerging Local Plan;
 - The Mayor of London's Housing Supplementary Planning Guidance (SPG);
 - The Mayor of London's Affordable Housing and Viability SPG.
- 1.7. This document has also had regard to the London Borough Viability Protocol which can be found on www.londonviability.org.uk.

2. Local and Policy Context

Tower Hamlets context

- 2.1. The delivery of homes is the biggest challenge for the borough. The borough's population is expected to increase from an estimated 301,000 at the end of 2016/17 to 395,000 by the end of the year 2030/31. Over the last 10 years, Tower Hamlets has experienced the fastest population growth in London and the borough has continued to transition from its industrial heritage to become a more attractive place to live. The delivery of housing in the borough is required, not only to respond to local need, but also to fulfil the borough's duty to cooperate with neighbouring boroughs and help meet strategic housing needs identified in the London Plan.
- 2.2. Tower Hamlets is expected to deliver 39,310 new homes, approximately 10% of the London Plan total London Housing target, by 2025. The Borough's ability to supply land for housing in these quantities is becoming increasingly limited as a significant proportion of available housing sites have planning consents or have been developed. Land is also needed to deliver the necessary infrastructure to ensure the borough is delivering homes supported by schools, open space, transport and health facilities.
- 2.3. However, demand for new homes in Tower Hamlets is healthy which has contributed to a relatively buoyant property market. The borough has a large number of granted planning consents and there is a significant development pipeline. In April 2017 the average house price in Tower Hamlets was £470,021; this is an increase of 2.9% from the year before (£456,740 in April 2016). Dips in residential values in the borough over the last 20 years have been relatively short lived, and have been more than offset by subsequent increases.
- 2.4. The challenge for Tower Hamlets is that high levels of deprivation and poverty exist in the borough, which provides a stark contrast to the wealth and prosperity that has grown around Canary Wharf and the City fringe areas of the borough. There are nearly 20,000 households on the Common Housing Register with over 50% in high priority need. Evidence from both the Greater London Authority and the Tower Hamlets Strategic Housing Market Assessment estimate a need for an additional 46,458 homes by 2031.
- 2.5. The shortage of affordable homes has led to an extremely heated housing market. The private rented sector has doubled in size over the past 10 years but rents are beyond the reach of households on average incomes are well above Local Housing Allowances. Private market sales start at a minimum of £300,000 for an ex local authority right to buy flat and so even the lowest level of home ownership is beyond the mean of average income households.
- 2.6. For these reasons, the Council is in the process of reviewing the Local Plan to respond to these challenges and make sure the Council delivers a wide range of high quality homes suitable for the borough's existing and future households in terms of their size, need and income.

Policy Context

- 2.7. The National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) on Viability and Decision Taking, the London Plan (2015), the Council's

Core Strategy (2011) and the Council's Managing Development DPD (2013) establish that the key purpose of planning is the delivery of sustainable development. Sustainable development requires new housing, including affordable housing, to meet our housing needs. It also requires competitive economies, thriving town centres, efficient transport and effective infrastructure. Development is required to be in accordance with these Plans.

- 2.8. The NPPF states in Paragraph 173 that careful attention to viability should take place to ensure that the burden of required or necessary planning obligations, such as affordable housing, do not threaten the viability of development, and provide a competitive return to willing land owners and developers when taking the normal costs of development into account.
- 2.9. Assessing viability demonstrates the scale of planning obligations which are appropriate. However, the NPPF is clear that where safeguards are necessary to make a particular development acceptable in planning terms, and these safeguards cannot be secured, planning permission should not be granted for unacceptable development.
- 2.10. Paragraph 23 of the PPG states that the assessment of land or site value is a key consideration and an important input into a financial viability assessment. It states there are a range of acceptable approaches to assess the value of land, but there are common principles which should be reflected in all cases. Land valuations should:
 - Reflect policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge;
 - Provide a competitive return to willing developers and land owners (including equity resulting from those wanting to build their own homes); and
 - Be informed by comparable, market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise.
- 2.11. The Mayor of London's Housing SPG adopted in March 2016 is relevant. Paragraph 4.1.4 states that the market value, alternative use value or existing use value (also known as current use value) plus a premium approach to identifying the benchmark land value can satisfy the NPPF's requirement to ensure a competitive return to a willing landowner. The Mayor supports the existing use value plus a premium approach as the most appropriate for planning purposes because it can be used to address need to ensure that development is sustainable in terms of the NPPF and Local Plan requirements. This SPD is consistent with the favoured methodology in the Mayor's Housing SPG.
- 2.12. This SPD takes account of the Mayor of London's Affordable Housing and Viability SPG. The SPG advocates an existing use value plus a premium approach to the establishment of benchmark land values. It also refers to a threshold approach to viability – this proposal is considered in this document.
- 2.13. The NPPF also requires that the costs of planning policy requirements should allow for competitive returns to a willing land owner and willing developer to

enable development to be deliverable. Paragraph 174 further states that Local Planning Authorities should assess the likely cumulative impacts of policies and standards on development, which should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle.

- 2.14. The Council has fully considered the cumulative impact of its policy requirements on development viability as part of the Examination of its Local Plan and Community Infrastructure Levy (CIL) Charging Schedule. These were found to be sound by independent examiners following a process of Public Examination which followed extensive public consultation.
- 2.15. This document has been prepared in line with the Council's emerging new Local Plan. It will be reconsidered on its adoption as well as on the adoption of other material considerations.

3. Key Requirements (KR) Overview

3.1. Below is a table that summarises the key requirements set out in this SPD:

Pre-application Advice	
KR1	Applicants are strongly encouraged to submit a draft financial viability assessment when seeking pre-application advice where a proposal is likely to trigger a requirement to provide affordable housing or where viability is likely to be a relevant consideration in respect of achieving planning policy compliance.
Applications	
KR2	All planning applications ¹ which trigger a planning policy requirement to provide affordable housing, and the policy requirement is not met, or where viability is relied on as a material consideration, are required to provide a FVA.
KR3	The Council will have regard to the threshold approach to viability in accordance with the process set out in the Mayor of London's Affordable Housing and Viability SPG. The Council will keep this matter under review to ensure it is effectively meeting its objectives.
KR4	Where Estate Regeneration development is subject to an 'Options Appraisal' stage, in order to ensure options can be fully scrutinised by residents affected by the proposed regeneration, the developer is encouraged to make FVAs for each of the options available in accordance with the transparency principles set out in this document.
KR5	Applicants are required to meet the cost of the Council reviewing financial viability assessments and provide an undertaking to do so in order to for a planning application to be validated.
KR6	Financial viability assessments should be accompanied by an Executive Summary which outlines the key conclusions being drawn from the appraisal, and the Tower Hamlets Appraisal Inputs Summary Sheet.
KR7	Revised appraisals (with revised Executive Summary and the Appraisal Inputs Summary Sheet) should be submitted to the Council prior to referral for decision where the financial viability assessment changes throughout the planning application process.
KR8	Financial viability assessments should be accompanied by a fully testable and editable electronic/software model which explicitly shows the calculations and assumptions used in the assessment.
Transparency and Deliverability	
KR9	Financial viability assessments that support pre-application discussions will be treated as confidential.
KR10	The Council will undertake the following actions in respect of making FVAs available to the public: <ul style="list-style-type: none"> • The full FVA and Executive Summary, submitted in accordance with the Council's transparency requirements, will usually be published as soon as practicable following validation; • Revised full FVAs, Executive Summaries and assessments commissioned by the Council will usually be published prior to any Planning Committee meeting/hearing where the related application

¹ except where they meet the 'Threshold Approach' requirements set out in the Mayor of London's Affordable Housing and Viability SPG.

	is being decided, or where applicable prior to a delegated determination.
KR11	The Council may allow for exceptions to this in limited circumstances and only in the event that there is a convincing case that disclosure of an element of a viability assessment would cause harm to the public interest to an extent that is not outweighed by the benefits of disclosure. If an applicant considers that an exceptional circumstance is likely to arise, this should be raised at an early stage within the pre-application process.
KR12	FVAs cannot demonstrate that schemes as proposed are technically unviable; FVAs that may have previously been submitted showing this must be adjusted so that the viability impact of the proposed scheme is expressed in terms of the impact on the scheme's profit. Alternatively growth projections can be included in an FVA to account for any deficit.
KR13	An applicant should demonstrate how their proposed scheme is deliverable, taking into account their proposed level of planning obligations.
Methodology	
KR14	The Residual Land Value methodology is the most appropriate to use when undertaking a viability assessment for a planning application. In this approach, Development Plan requirements are included alongside other development costs, which are deducted from the Gross Development Value to determine the residual value that is available to pay for land.
KR15	Where schemes are identified as unviable at the proposed level of planning obligations, either growth assumptions should be included or the level of profit allowed for should be adjusted, to the extent that the scheme as proposed demonstrates viability.
KR16	Assumptions relating to development values should be justified with reference to comparable properties, appropriate market evidence and where relevant, arrangements with future occupiers, including rents and lease arrangements.
KR17	Development costs adopted within viability assessments are typically determined based on current day figures at the point of the planning permission. In most cases a specific assessment of build costs ('Cost Plans') will be required to be submitted.
Benchmark Land Values	
KR18	Benchmark Land Values (BLVs) should always reflect policy requirements, planning obligations and CIL charges.
KR19	In most cases, BLVs will be assessed with reference to existing use value (EUV) of the site, plus a financial incentive ('premium') that would ensure the release of the land from its existing use. The premium above EUV that is applied will generally not be expected to exceed 20% but will be considered on a site by site basis.
KR20	A realistic alternative scheme may be used to form a BLV, particularly where the site in question has no existing use value. It is not necessarily the case that a planning permission for the alternative use must be in place (however this is preferred), However the application of a particular alternative use will need to meet a number of criteria, such as: <ul style="list-style-type: none"> • The alternative use would be policy compliant and would secure

	<p>permission;</p> <ul style="list-style-type: none"> • There would be no additional costs or delay in securing that permission – or those additional costs and delays are assessed; • The alternative proposal is required to be worked up to an appropriate level of detail, as described in this SPD; • There is a real world demand for the alternative at the values assumed; • In the real world the landowner could really develop out the alternative rather than use it as a negotiating lever to force down affordable housing.
KR21	The Council will only accept the Purchase Price or the Market Value as the BLV of the scheme where these figures fully reflect policy requirements, planning obligations and planning contributions.
Viability Reviews	
KR22	A viability review mechanism will be required to be incorporated within S106 agreements for all application schemes that do not propose to provide a policy compliant level of planning obligations, such as affordable housing, due to viability.
KR23	Pre-Implementation Reviews: If substantial implementation (which can be agreed between the Council, the applicant and where appropriate the Greater London Authority) occurs after 24 months (at which point the initial viability assessment will be deemed to be out of date) a pre-implementation review will usually be triggered. This should take place within a 3 month period following substantial implementation.
KR24	Mid Term Reviews: In the case of phased developments, mid-term reviews will be required in respect of all phased schemes that require a review. The review will take place prior to implementation of later phases of a development.
KR25	Advanced Stage Reviews: Advanced stage reviews will be required on all schemes requiring a review. For residential led schemes, advanced stage reviews should be undertaken on sale of 75% of market residential units, and for other schemes, within a three month period prior to practical completion.
KR26	Viability Reviews will generally expect to be carried out in accordance with the formulas described in Appendix B but can be considered on a case-by-case basis.
Affordable Housing: Payments in Lieu and Off-Site Delivery	
KR27	Payment in lieu contributions must be calculated alongside negotiations related to FVAs and should generally accord to the formula described in this document.

4. Process Overview

A threshold approach to viability

- 4.1 The Mayor of London's Affordable Housing and Viability SPG, sets out a process whereby schemes that meet or exceed 35% affordable housing, without public subsidy, are not required to submit detailed viability information alongside relevant planning applications. The following key points should be noted concerning this approach:
- The 35% threshold will need to take into account of a range of affordable housing sizes (including family sized homes) and local tenure mix policies.
 - Schemes that meet the threshold will be the subject of an early stage review mechanism if the scheme is not implemented within 2 years.
 - Schemes that propose off site or cash in lieu contributions are not suitable in respect of the threshold approach.
- 4.2 The Council will have regard to the threshold approach to viability in accordance with the process set out in the Mayor of London's Affordable Housing and Viability SPG. The Council will keep this matter under review to ensure it is effectively meeting its objectives.

Estate Regeneration Schemes

- 4.3 Where Estate Regeneration development is subject to an 'Options Appraisal' stage, in order to ensure options can be fully scrutinised by residents affected by the proposed regeneration, the developer is encouraged to make FVAs for each of the options available in accordance with the transparency principles set out in this document.

Pre application advice

- 4.4 In accordance with the Planning Practice Guidance (PPG paragraph 001), we encourage potential applicants to seek pre-application advice prior to the submission of a full planning application. This is to ensure emerging development proposals comply with our adopted planning policies.
- 4.5 We strongly encourage the submission of a draft Financial Viability Assessment (FVA) as part of pre-application discussions where a proposal is likely to trigger a requirement to provide affordable housing or where any subsequent full application is likely to rely on a FVA to justify a departure from planning policy requirements. Failure to present a FVA which has been prepared in accordance with the principles set out in this SPD will limit the quality of advice Council officers are able to provide.
- 4.6 The level of detail that can be provided at the pre-application stage will vary from scheme to scheme and will depend largely on the scale of the proposed development and how advanced the emerging proposal is. The draft FVA will act as a useful tool in refining emerging proposals prior to submission of a full application.

Planning applications

- 4.7 All planning applications which trigger a planning policy requirement to provide affordable housing and the policy requirement is not met, or where viability is relied on as a material consideration, are required to provide a FVA. Where a Section 73 (S.73) application is submitted that relates to a permission that required a planning policy requirement to provide affordable housing, an FVA is required to be submitted where the S.73 alters the economic circumstances of the scheme. A change in economic circumstances may constitute, but is not limited to, where the scheme is being amended in a way that would increase its Gross Development Value.
- 4.8 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, an FVA may be required to be submitted to demonstrate that the proposal is securing the heritage asset's optimum viable use. Applicants can engage with the Council's Development Viability or Strategic Planning Team to clarify where a submission of an FVA is required.
- 4.9 Failures to submit an FVA in the circumstances set out in paragraphs 4.7 and 4.8 above will likely result in the application failing to meet validation requirements and will prevent officers having sufficient information to determine the application. The FVA should be prepared and presented in accordance with the guidance in this SPD and the Council's Local Validation Requirements Checklist.
- 4.10 The submission of a FVA with a planning application will ensure the Council has the information required to effectively review financial viability assessments at the outset, thereby reducing the likelihood that further evidence will be required during the application process.
- 4.11 FVAs should be accompanied by sufficient details to enable the Council to understand the scheme value and valuation assumptions relied upon by the applicant. Following a detailed review of a FVA, we may identify a need for further justification to support the chosen inputs in the financial viability assessment. Failure to provide further information may result in delays to the application or may affect an officer's recommendation.
- 4.12 A revised FVA should be submitted prior to referral for decision where material changes are made that could affect the viability of the proposal.
- 4.13 All FVAs should be accompanied by:
1. **A fully working software model** that can be tested (our preference is for Argus Developer²) however, for larger and more complex schemes, bespoke financial models are often produced using alternative software. We will accept alternative appraisal models in these circumstances.
 2. **An Executive Summary Report** which should provide a full supporting narrative to substantiate the inputs and assumptions made in the appraisal. This is to be a simplified version of the assessment that may aggregate costs

² Argus Developer is an industry standard software package widely used to assess the viability of development proposals.

provided they explicitly show the calculations and can be fully interrogated. It should summarise the key inputs, findings and conclusions for the lay reader;

3. An Appraisal Inputs Summary Sheet which should set out the key inputs and conclusions of the FVA. This should be submitted in Excel format. Please refer to Appendix A for the template of this Summary Sheet.

- 4.14 FVAs will be reviewed by the Council or referred to assessors who will usually be appointed under a competitive tendering process. Conclusions described in reviews are required to be backed up by evidence. Applicants will be required to meet the costs, as specified by the Council, associated with reviewing FVAs, including legal fees and cost consultancy fees if appropriate. We recognise that requiring payment of these costs prior to the work being carried out might be difficult and could delay the planning application process. Therefore, the Council will require the submission of a solicitor undertaking to pay the fees at the planning application validation stage. Such an undertaking may also be expressed in a Planning Performance Agreement.
- 4.15 Failure to submit a full FVA, Executive Summary and an Appraisal Inputs Summary Sheet will likely result in the associated application not being validated.

Grant Funding

- 4.16 All planning applications and related FVAs are required to account for amounts of grant funding that are likely to be available.

Build to Rent Schemes

- 4.17 The process for considering viability for Build to Rent schemes may vary slightly from conventional 'build for sale' schemes to account for the potentially distinct economics of this type of development.

5. Transparency, Deliverability and Information Requirements

Transparency

- 5.1 The Council recognises the importance of public participation and the availability of viability information in the planning process. This enables members of the public to ascertain whether viability evidence is reasonable and robust, whilst helping to maintain confidence in the planning system and the accountability of those undertaking the assessments. This is particularly relevant in circumstances where it is argued that the Council's affordable housing target or other policy requirements cannot be met due to financial viability.
- 5.2 Applicants can reasonably expect that FVAs (and accompanying documents) submitted in support of planning applications (not pre-application discussions) can be made available to the public alongside other application documents. In submitting information, applicants do so in the knowledge that it may be made publicly available. FVAs may be shown to Local Councillors where requested, even if the FVA in question hasn't been made available to the public.
- 5.3 The Council may allow for exceptions to this in very limited circumstances and only in the event that there is a convincing case that disclosure of an element of a FVA would cause harm to the public interest to an extent that is not outweighed by the benefits of disclosure. Given the significant benefits associated with the availability of information to the public as a part of the decision making process, and the other factors identified above, the Council anticipates that there would be very few exceptions. In addition, the Council may allow the submission of a FVA that aggregates potentially commercially sensitive inputs.
- 5.4 If an applicant wishes to make a case for an exception in relation to an element of their assessment being made publicly available, they should provide a full justification as to the extent to which disclosure of a specific piece of information would cause an 'adverse effect' and harm to the public interest that is not outweighed by the benefits of disclosure. Alongside this justification the applicant should submit an FVA that aggregates the information that the applicant considers should not be made publicly available. The Council will consider this carefully, with reference to the 'adverse effect' and overriding 'public interest' tests in the Environmental Information Regulations 2004 (EIR), as well as the specific circumstances of the case.
- 5.5 The Council will usually undertake the following actions in respect of making FVAs available to the public:
 - The full FVA and Executive Summary, submitted in accordance with the Council's transparency requirements, will usually be published as soon as practicable following validation;
 - Revised full FVAs, Executive Summaries and assessments commissioned by the Council will usually be published prior to any Planning Committee meeting/hearing where the related application is being decided, or prior to determination, whichever is earlier.

Deliverability

- 5.6 The Council has received FVAs development appraisals which indicate that a development would generate a significant deficit with the level of planning obligations as proposed by the applicant, even at a level lower than required by policy. This raises questions regarding the commercial basis of the proposed scheme and the terms under which development finance is likely to be secured. This would also appear to be at odds with general market conditions and the high rates of development within the borough (where not explained by circumstances specific to the site). FVAs cannot demonstrate that schemes as proposed are technically unviable; FVAs that may have previously been submitted showing this must be adjusted so that any deficit is expressed in terms of the impact on the scheme's profit – this will better inform the Council of the position of applicants where schemes demonstrate a deficit. Alternatively growth projections can be included in an FVA to account for any deficit.
- 5.7 An appraisal which shows a different level of planning obligations to be viable from that proposed by the applicant raises issues relating to the deliverability of a scheme and makes it difficult for the Council to make an informed decision. It also poses the risk of a lower level of planning obligations being sought by the applicant at a later date after planning consent has been secured.
- 5.8 An applicant should demonstrate how their proposed scheme is deliverable, taking into account their proposed level of planning obligations. The applicant must clearly demonstrate with reference to viability evidence that the proposed level of obligations is the maximum that can be provided and that the scheme is deliverable with this level of provision.
- 5.9 Where the applicant does not intend to build out the scheme themselves, they may be expected to provide evidence from a developer (with experience of delivering schemes of a similar type and scale) that the scheme is capable of being delivered on the basis of the evidence presented in the FVA.

Information requirements and assessment of submitted information

- 5.10 A number of FVA related documents must be submitted with planning applications. All of these documents can only be submitted on the basis that they can be made available to the public alongside other application documents. In submitting information, applicants do so in the knowledge that it may be made publicly available.
- 5.11 The following FVA related documents must be submitted alongside planning applications:
1. **An Executive Summary Report:** This should provide a full supporting narrative to substantiate the inputs and assumptions made in the appraisal. This is to be a simplified version of the assessment that may aggregate costs provided the full FVA explicitly breaks down the costs. It should summarise the key inputs, findings and conclusions for the lay reader;
 2. **A full Financial Viability Assessment:** This document will need to contain sufficient details to enable the Council to consider, interrogate and understand the financial viability of the scheme. This document should be formed in accordance with this SPD and the Council's Local Validation

Requirements Checklist. More specifically, it should contain detailed information on the following:

- Development Value;
- Scheme Details and Development Programme;
- Affordable Housing Values;
- Build and other Costs;
- Developer Profit;
- Benchmark Land Value;
- Planning Contributions;
- Development Finance;
- Working Appraisal Model (such as Argus Developer).

3. **An Appraisal Inputs Summary Sheet:** This should set out the key inputs and conclusions of the FVA. This should be submitted in Excel format. Please refer to Appendix A for the template of this Summary Sheet.

5.12 All full FVAs submitted (and Council reviews) must be accompanied by the following:

1. A statement of objectivity, impartiality and reasonableness: This is to confirm parties have acted with objectivity, impartially and without interference;
2. A confirmation of instructions and confirmation of no conflicts of interest;
3. A no contingent fee statement: This is a statement confirming that in preparing a report, no performance related or contingent fees have been agreed.

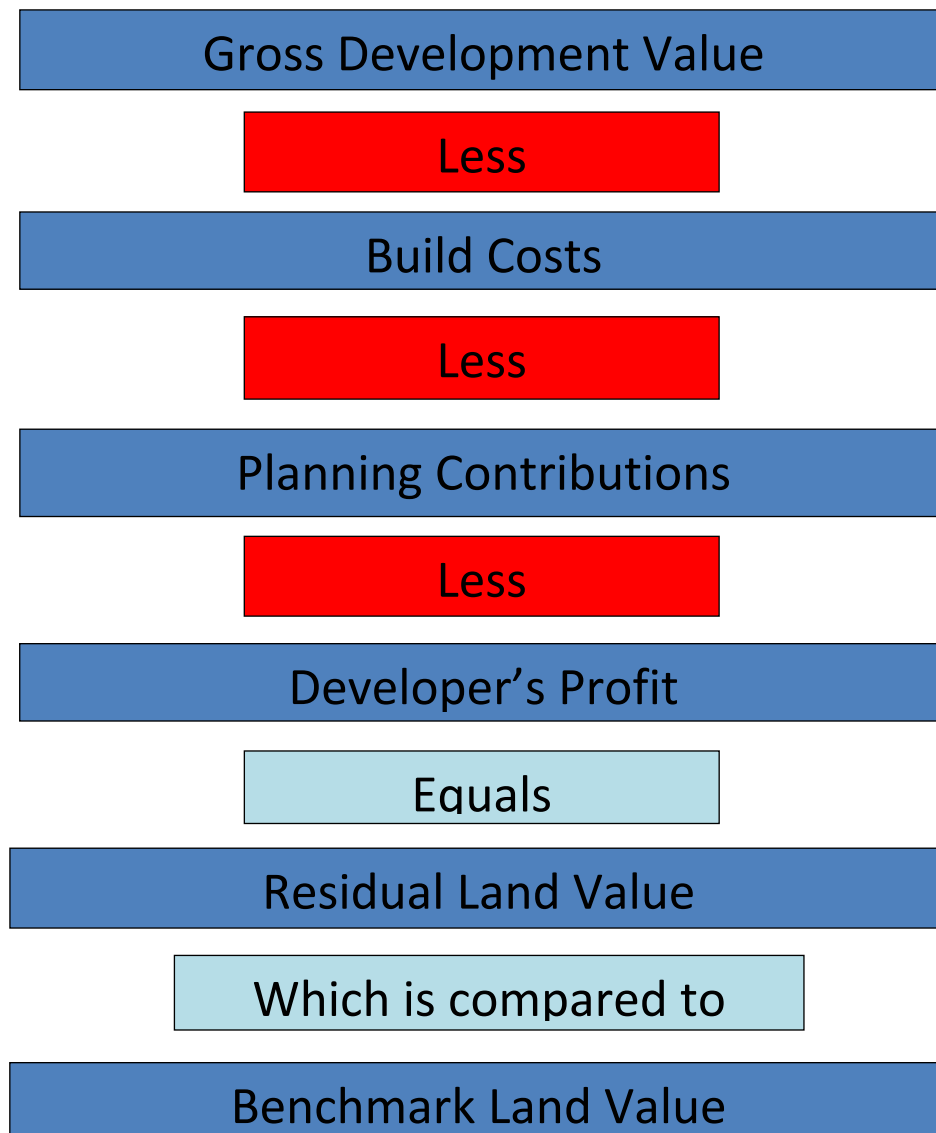
5.13 The Council will usually commission an independent assessment from a consultant to assess the inputs and conclusions of the submitted FVA information. The costs of this assessment will be met by the applicant.

6. Methodology: Financial Viability Assessments

Overview

- 6.1 FVA's should apply the 'Residual Land Value' valuation methodology in most cases. This involves establishing the 'residual' value that is available to pay a landowner once the costs of undertaking the development and a reasonable developer's profit are deducted from the Gross Development Value (GDV) generated by the development.
- 6.2 Where schemes are identified as unviable at the proposed level of planning obligations, the level of profit allowed for should be adjusted to the extent that the scheme as proposed becomes viable. This will help identify the level of profit/loss the applicant/developer is prepared to accept on a current day basis.
- 6.3 The following diagram outlines the 'Residual Land Value' methodology FVA submissions should accord to:

Diagram 1: 'Residual Land Value' methodology for forming Financial Viability Assessments



- 6.4 Please find below commentary specific to each of the components/stages set out in Diagram 1 above.

Gross development value (GDV)

- 6.5 This is the revenue of a proposed development, generally assessed on the special assumption that the development is complete as at the date of valuation in the market conditions prevailing at that date. However, in some circumstances it may be appropriate to reflect growth when deriving the GDV.
- 6.6 GDV is determined by assessing the total value of a development based on the value of the individual uses within the development. This is derived from the sales values of any units or parking spaces to be sold, as well as the rental value of any properties to be rented which are capitalised using a 'yield', to give an overall capital value (including ground rents). Development values adopted within viability assessments are typically determined based on current day figures at the time of determination.
- 6.7 Assumptions relating to development values should be justified with reference to comparable properties, appropriate market evidence and where relevant, arrangements with future occupiers, including rents and lease arrangements. Information relating to other properties that is provided to justify assumed development values should be directly comparable to the site in question for it to be given appropriate weight, or should be adjusted to ensure appropriate comparison. Transactions or market data should be up to date (from at least within the last 6 months), within an appropriate distance from the site, and relate to new build properties. If, in exceptional circumstances, there is a lack of new build data it may be appropriate to provide information for existing properties, although a premium should be applied where this is the case.
- 6.8 Information relevant to comparable properties should be fully analysed to demonstrate how this has been interpreted and applied to the application scheme. Where an assessment refers to indices or other information sources generated by third parties, a full examination of the data and methodology used to inform the index would need to be provided for it to be considered acceptable.
- 6.9 Where market residential properties are valued on the basis that they will be rented, the Council may require the applicant to enter into a planning obligation that the property will not be sold within a certain timeframe. In such cases the ability to sell the property at the end of that timeframe should be taken into account when establishing a capital value for the property.

Build costs

- 6.10 Development costs adopted within viability assessments are typically determined based on current day figures at the point of the planning permission. Build cost assumptions should aim to factor in costs for items that are a requirement of planning policy. Justification should be provided where it is considered policy requirements cannot be met.
- 6.11 The RICS Build Costs Information Service (BCIS) is a publically available source of cost information which can be used in viability assessments. The selection of BCIS values must correctly reflect the specific nature, location and size of proposal, and be justified to show that an appropriate and reasoned

approach has been taken in estimating the costs. In such instances where costs are agreed by the Council, this would be an acceptable basis of cost inputs as part of a review mechanism, linked to the Tender Price Index (TPI).

- 6.12 In most cases it is likely to be more appropriate to rely on a specific assessment of build costs ('Cost Plans'). In these circumstances, costs should be fully justified based on a detailed specification of the proposed development and the intended construction approach. The information should be provided on an elemental basis with a full breakdown of costs into component parts. This should be benchmarked against commercial sources of information such as BCIS or Spon's price books. Costs should also be distinguished for different parts of the scheme such as market and affordable housing.
- 6.13 Cost Plans should provide a clear breakdown of the cost per sq. m of the proposed scheme and be accompanied by a list of any exclusions and assumptions. Where these are relied upon, these will be specifically reviewed by the Council who will usually appoint a cost consultant or quantity surveyor to review the submission on its behalf. In this instance, applicants will be required to pay the reasonable fees of the appointed cost consultant or quantity surveyor.
- 6.14 The Council will expect a clear correlation to be evident between a development's specification, assumed build costs and development values. Build costs and values should also be formulated on a consistent basis. Where current day values are adopted, build costs should not incorporate cost inflation. Professional and marketing fees adopted at the higher end of typical ranges would be expected to be associated with higher values.
- 6.15 It is important that any site-specific or abnormal costs are disaggregated and supported by robust evidence. Associated works must be directly related to the site and development as listed in the planning application (e.g. additional costs attached to remediation, protection of heritage assets on site etc) and required in order to enable the development to proceed. The Council will have regard to the nature of any abnormal costs that will apply and also the impact that this has on land value. It should not be assumed that abnormal costs would necessarily be borne exclusively at the expense of compliance with the Development Plan, as a site involving abnormal development costs is likely to attract a lower land value than could be achieved on a site where this was not the case.
- 6.16 The following table describes how other costs should be treated in FVAs:

Element	Description
Contingencies	Contingency allowances should: <ul style="list-style-type: none"> • be clearly identified; • be accompanied by an explanation as to what they are for; • show how they were calculated.
Enabling and demolition costs	Enabling works costs, including demolition, decontamination or utilities should be stated separately alongside evidence as to the amounts applied.
Finance costs	Finance costs should be included at a level which is evidenced by reference to

	the prevailing market rate.
Legal fees	Legal fees should be fully justified by reference to market rates. For larger developments, economies of scale are expected to occur, resulting in proportionally lower costs.
Professional fees	The level of professional fees should be stated separately for each discipline included, both as a percentage and the monetary amount.
Marketing costs	Estate agency sale and letting fees and other marketing costs should be fully justified. For larger developments, economies of scale will generally be expected to apply, resulting in proportionally lower costs.

Planning contributions

- 6.17 The Council can assist applicants in calculating the likely financial contributions arising from a development and it is important that these inputs are accurately reflected in any viability information submitted to the Council. This should be discussed at pre-application stage with an applicant submitting draft Section 106 (S106) Heads of Terms as a part of an application (see also Sections 3).
- 6.18 The Mayor of London introduced his Community Infrastructure Levy (CIL) Charging Schedule on 1st April 2012. The Council adopted its CIL Charging Schedule on 1st April 2015.
- 6.19 Mayoral and Borough CIL charges applied in FVAs should reflect any relief that will apply, such as social housing relief or charitable relief, and should be calculated in accordance with the CIL Regulations 2010 (as amended), for example, with existing floorspace discounted if relevant and the phasing of payments taken into account for phased developments. It is additionally important to ensure that the impact of the Mayoral and Borough CIL instalment policies are taken into account, as this will determine the timing of payments, and that likely indexation on CIL allowances should be applied.
- 6.20 The Council's Planning Obligations SPD provides guidance on which obligations apply following the adoption of the local CIL. These typically relate to non-infrastructure and site-specific requirements such as carbon offsetting and employment and training contributions but can extend to infrastructure related requirements.

Developer's profit

- 6.21 The most common approach for calculating developer's profit in viability assessments submitted as a part of the planning process is either as a factor of Gross Development Cost (GDC) or Gross Development Value (GDV). In this case the unit of measurement is monetary so that a development proposal's viability surplus or deficit can be easily quantified. Also, it is a comparatively stable measure in that a relatively small change in a scheme's development programme is unlikely to significantly change the developer's profit.

- 6.22 An alternative approach that has been applied on some longer term and phased developments is the use of Internal Rate of Return (IRR). This is a metric for measuring scheme viability which is typically used to provide a time weighted measure of an investment's return to help determine whether to commit investment capital.
- 6.23 The appropriate metric to assess profit will depend on the scale of the scheme and it's financing. We would expect schemes to demonstrate profit on cost and profit on value. The Council will take IRR into account if requested by the applicant, provided the development programme and timings of costs and values are fully justified.
- 6.24 Regardless of the measure of profit that is considered to be the most appropriate, the level of profit allowed for should reflect the risks associated with the scheme as well as the prevailing market evidence relating to acceptable levels of profit.
- 6.25 In most cases the Council expects that profit on residential development, including affordable housing, to be expressed as a % of GDV.
- 6.26 Where schemes are identified as unviable at the proposed level of planning obligations, the level of profit allowed for should be adjusted to the extent that the scheme as proposed becomes viable.

Benchmark land value (BLV)

- 6.27 The process for establishing an appropriate benchmark land value (BLV) for a viability assessment is one of the most important issues within a viability assessment because this indicates the threshold for determining whether a scheme is viable or not.
- 6.28 A development is deemed to be viable if the 'residual land value' is equal to or higher than the benchmark land value as this is the level at which it is considered that the landowner has received a reasonable return and will release the land for development.
- 6.29 In most cases, BLVs will be assessed with reference to existing use value (EUV) of the site, plus a financial incentive ('premium') that would ensure the release of the land from its existing use. This is called "existing use value plus" (EUV+). The premium above EUV that is applied will generally not be expected to exceed 20% but will be considered on a site by site basis.
- 6.30 A realistic alternative scheme may be used to form a BLV, particularly where the site in question has no existing use value. It is not necessarily the case that a planning permission for the alternative use must be in place (however this is preferred), However the application of a particular alternative use will need to meet a number of criteria, such as:
- The alternative use would be policy compliant and would secure permission;
 - There would be no additional costs or delay in securing that permission – or those additional costs and delays are assessed;

- The alternative proposal is required to be worked up to an appropriate level of detail, as described in the paragraph below;;
- There is a real world demand for the alternative at the values assumed;
- In the real world the landowner could really develop out the alternative rather than use it as a negotiating lever to force down affordable housing.

6.31 All proposals that intend to use an alternative use to form the BLV have to be accompanied by:

1. A statement that sets out:
 - A description of the alternative scheme including floor areas;
 - Why the applicant considers that the alternative use would be policy compliant and would secure permission;
 - Evidence to demonstrate there is a real world demand for the alternative use scheme at the values proposed in the accompanying appraisal (see below);
 - In instances where there is a public benefit test to be applied (pursuant to Section 66 or 72 of the Planning (Listed Building and Conservation Areas) Act 1990 and Chapter 12 of the NPPF) the public benefits for the alternative scheme and details of how they compare with the proposed scheme that the application is the subject of;
 - Anything else the Council considers relevant in the context of the particular application.
2. A set of floor plans and elevation drawings (or elevation massing diagrams) for the alternative scheme proposed;
3. A site layout plan including basic servicing and transportation details;
4. An appraisal that demonstrates the residual land value of the alternative use scheme, prepared in accordance with the principles described in this SPD, incorporating realistic current day costs and values that are backed up by evidence. This appraisal should account for any delay that would apply in securing the permission for the alternative use.

6.32 The 'Market Value' of a proposed development raises concerns of inadequate reflection of policy requirements, circularity and inflated land values which inappropriately reduce planning obligations.

6.33 The Council will only accept the Purchase Price or the Market Value as the BLV of the scheme where these figures fully reflect policy requirements, planning obligations and planning contributions. Where these methods of BLV are proposed they will be required to be fully evidenced.

Build to Rent Schemes

6.34 The approach to assessing viability for Build to Rent schemes may vary from 'build for sales' schemes although this will be considered on a case by case basis.

6.35 Viability matters in this context should be treated in accordance with the requirements set out in the Mayor of London's Affordable Housing and Viability SPG. In particular:

- All homes on build to rent developments should be under single management;
- That these schemes will need to remain for rent for at least a period of 15 years and where reversion to sale products takes place that a clawback mechanism is applied to secure additional affordable housing if the 'distinct economics' of build to rent proposals result in a lower provision of affordable housing versus what would have been provided for a 'sale' scheme;
- Management standards: Longer tenancies should be available to all tenants. Formula linked rent increases should be included within tenancy agreements. There should be on-site management.

7. Viability Reviews

Overview

- 7.1 Where a development proposal cannot meet planning policy requirements due to viability and the Council resolve to grant planning permission, the Council will generally require the submission of a revised financial viability assessment following the substantial implementation of the scheme. This will ensure that improvements in scheme viability between the date that the planning permission was granted and the date the development was substantially implemented contribute towards meeting minimum policy requirements that were not possible at the date of consent. This approach is encouraged in relation to affordable housing in Policy 3.12 of the London Plan (2015).
- 7.2 Where applications are made under the 'Threshold' approach, Review mechanisms will be applied in accordance with the approach set out in the Mayor of London's Affordable Housing and Viability SPG.
- 7.3 The costs, values and other factors of a scheme can alter significantly from the point planning permission is granted to when it is substantially implemented. Viability reviews enable the applicant to continue to receive the level of profit required, as agreed at the date of consent. This means that viability reviews will not increase risk for the applicant as it will still allow for a competitive return.
- 7.4 As the level of planning obligations being provided from a development is a key consideration in decision-making, no viability review can result in the scheme providing a reduced level of planning obligations from the scheme that was the subject of the original permission.
- 7.5 All documents that relate to viability reviews will be subject to the same rules of disclosure as full FVAs, i.e. that they can be made available to the public alongside other application documents.

Timings

- 7.6 Viability reviews carried out at an early stage in the development or prior to the implementation of later phases have the benefit of increasing the likelihood that additional affordable housing can be provided on site. The advantage of undertaking viability reviews towards the end of a development on the other hand is that robust, up to date values and costs can be taken into account.
- 7.7 The Council will therefore require viability reviews to take place at the following stages:
 - Pre-implementation review: This is required if substantial implementation hasn't occurred within 24 months of planning permission. A definition of 'substantial implementation' can be agreed between the Council, the applicant and where appropriate the Greater London Authority at the application stage;
 - At an advanced stage of development (advanced stage review), a review will ensure that viability is accurately assessed and up to date. In addition, in view of the priority given to onsite delivery of affordable housing, where substantial implementation of a development does not occur within 24

months of the date of planning permission a pre-implementation review will be required;

- On phased developments: an additional viability review will be required at a mid-point stage in the development (prior to implementation of the second half/ later phases of the development) (mid-term review).

Deficits identified at application stage

- 7.8 If a scheme provides a higher proportion of affordable housing to that which has been demonstrated to be viable at application stage, it may be necessary to specify that a deficit is overcome before any surplus value is used towards the provision of additional affordable housing.

Viability review process

- 7.9 The Council will require an applicant to submit updated information for assessment by the Council at the point of the review. The Council will usually commission an independent review and the costs of this assessment will be met by the applicant. The review will assess changes to gross development value and costs, which are the key variables that are most likely to be subject to change. This will apply to the development as a whole (incorporating all uses) and be based on formulas (see Appendix B) to be included in the S106 agreement allowing for a transparent process. For completeness, the appraisal inputs and variables that are the subject of a viability review (i.e. base position vs. latest/achieved figures except where formulas state otherwise) are set out below:

- GDV (including the matters referred to in paragraphs 6.5 – 6.9 above) ;
- Base build costs including enabling costs;
- Abnormal costs;
- Professional fees;
- Legal fees;
- Marketing costs;
- Profit.

- 7.10 The formulas in Appendices B will generally be applied to determine whether a 'surplus' will be generated over and above required returns. The application of the formulas described can be considered on a case-by-case basis.

- 7.11 In the event of a surplus being identified through a review, the level of additional planning obligations (usually affordable housing) that will need to be provided (capped by the strategic affordable housing target) must be based on the (opportunity) cost to the developer of converting market housing into affordable housing as determined by the difference in value of market housing compared to its value as affordable housing. For other planning obligations that were not fully addressed at application stage, the level of any additional financial contribution (capped at a policy compliant level) will be determined by the initial formulas at each stage, as set out below.

- 7.12 An applicant's proposed approach to review mechanisms is required to be set out prior to the referral of any relevant scheme to the Council's development committees so this can be considered by the committee. The outcomes of

triggered review mechanisms will be fed back to the relevant development committee.

Pre-implementation reviews

- 7.13 Where a development has reached 'substantial implementation' within 24 months of the grant of planning permission, a pre-implementation review would not normally be required. If substantial implementation occurs after 24 months (at which point the initial viability assessment will be deemed to be out of date) a review will be required. This should take place within a 3 month period following substantial implementation.
- 7.14 The definition of substantial implementation is a matter that can be agreed between the Council, the applicant and where appropriate the Greater London Authority on a case by case basis but will seek to avoid a notional implementation of the scheme. If substantial implementation is achieved within a 24 month period but the development then stalls for a further period of 12 months, a further review will then be required.
- 7.15 Reviews which take place prior to implementation of a phased development should deliver additional on-site affordable housing in accordance with an 'Additional Affordable Housing Scheme' to be appended to the S106 agreement. This should identify the units to be converted to affordable housing in line with the Council's required tenure split.
- 7.16 Where there is remaining surplus which does not amount to the provision of one whole affordable housing unit, this surplus amount should be used as a contribution for off-site affordable housing or to provide any further planning obligations that were required but found to be unviable at application stage. The same applies in the case of mid-term reviews.
- 7.17 The pre-implementation review formula is set out in Appendix B. This operates in two stages, firstly to calculate the level of surplus available for onsite affordable housing (or other policy requirements) and secondly to determine the level of additional affordable housing floorspace deliverable from the surplus. Any surplus will be used to determine those units identified in the Additional Affordable Housing Schedule that will be converted to affordable housing up to the affordable housing target cap. For other policy requirements which take the form of a contribution, only Formula 1 in Appendix B will apply.
- 7.18 The Council's intended approach is to set out a clear basis for calculating the level of any additional requirements that could viably be provided while recognising that in some instances adjustments to the calculations may be warranted according to the circumstances of a specific proposal. For example, in circumstances where the conversion of different tenures would be appropriate, such as intermediate housing to social rented housing, the Council may apply an alternative formula which takes into account the difference in values of the relevant tenures.

Mid-term reviews

- 7.19 In the case of phased developments, mid-term reviews will be required which take place prior to implementation of later phases of a development. These should deliver additional on-site affordable housing in accordance with an Additional Affordable Housing Scheme to be appended to the S106 agreement.

- 7.20 Mid-term (and advanced stage) reviews should assess the development as a whole, taking into account values, costs and any surplus that has been realised in the initial stages of the development, as well as estimates for the subsequent phases. This is necessary to ensure that affordable housing provision is maximised and that other policy requirements that were not achievable at application stage, are met where viable. Where build costs were based on BCIS in the application stage assessment, these will be index linked from the date of the previous review.
- 7.21 Mid-term reviews will operate in two stages – the first to calculate any surplus based on the approach set out in Formula 3 in Appendix B, the second using the surplus to determine the level of additional affordable housing that can be provided based on Formula 2 (see section on pre-implementation reviews above).

Advanced stage reviews

- 7.22 Advanced stage reviews will be required on all schemes requiring a review. For residential led schemes, advanced stage reviews should be undertaken on sale of 75% of market residential units, and for other schemes, within a three month period prior to practical completion. This enables the assessment to be based on up to date, accurate information, while also retaining the ability to secure the additional provision of policy requirements. The outcome of this review will typically be a financial contribution towards offsite affordable housing provision or other policy requirements.
- 7.23 Any contribution payable in the event that a surplus is generated will be capped according to the level of contribution required by policy and associated guidance. For affordable housing contributions this will be based on the level of surplus required to provide additional affordable housing to meet the Council's strategic affordable housing target. The contribution and cap will be calculated in accordance with Appendix B.
- 7.24 In some instances adjustments to the calculations may be warranted according to the circumstances of a specific proposal. For example, where market and affordable housing values were clearly distinguished in the original appraisal calculation, it may be appropriate to allow for differential costs when determining the Advanced Stage Affordable Housing Cap.

8. Affordable Housing: Payments in Lieu and Off-Site Delivery

Payments in lieu

- 8.1 The development plan allows the Council to accept payments in lieu of affordable housing provision. These payments in lieu may be accepted where the Council considers it is not practical or viable to provide affordable housing on site or, failing that, off-site.
- 8.2 Payment in lieu contributions will be pooled to secure additional affordable housing provision, either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.
- 8.3 Payment in lieu contributions must be calculated alongside negotiations related to FVAs, in accordance with the following formula:

$$(A \times B) - (A \times C)$$

A = No. of habitable rooms of on-site affordable housing requirement to be delivered as private housing.

B = (Opportunity) cost to the developer of converting market housing into affordable housing per habitable room, as determined by the difference in value of market housing compared to its value as affordable housing.

C = Average value of affordable housing per habitable room (taking account of policy unit mix and tenure requirements).*

*determined as part of the review

- 8.4 The amount calculated in respect of the above formula will be required to be appropriately index linked to ensure the monetary contribution provided onto the Council at the payment trigger date will reflect the amount of affordable housing the Council needs to deliver using the contribution.

Off-site delivery

- 8.5 The development plan allows the Council to accept the delivery of affordable housing 'off site' in specified circumstances. 'Off-site' affordable housing will be treated as a contribution towards the Council's affordable housing target.

Glossary

Alternative Use Value (AUV): An alternative use value (AUV) is the value of a hypothetical scheme of development that is an alternative to the proposed scheme of development.

Benchmark Land Value (BLV): The benchmark land value the value below which the current use of the site will be continued. This is the value at which a reasonable landowner will be willing to release their site for development.

Community Infrastructure Levy (CIL): The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. Both a Local and a London wide CIL apply in Tower Hamlets.

Existing Use Value (EUV): Market value for the continuing existing use of the site or property assuming all hope value and any value arising from any planning permission or alternative use is excluded.

Financial Viability Assessment (FVA): A Financial Viability Assessment is an assessment of a scheme's financial viability. It can be used to assess whether a proposed scheme of development will proceed and whether planning obligations may need to be applied flexibly to enable a marginally viable proposed scheme of development to proceed.

Gross Development Value (GDV): Market value of the proposed development assessed on the special assumption that the development is complete as at the date of valuation in the market conditions prevailing at that date.

Market Value (MV): The estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arm's length transaction, after proper marketing and where the parties had each acted knowledgeably, prudently and without compulsion, subject to the special assumption that planning consent has been granted for the proposed scheme of development.

National Planning Policy Framework (NPPF): The National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied.

Planning Performance Agreement (PPA): A planning performance agreement is a project management tool which local planning authorities and applicants can use to agree timescales, actions and resources for handling particular planning applications.

Planning Practice Guidance (PPG): This a series of guidance documents (with one specific to Viability) relating to how the policies described in the NPPF should be applied.

Premium: Benchmark land values (BLV) will usually be calculated with reference to the existing use value (EUV) of the site, plus a premium that acts as a financial incentive that would ensure the release of the land from its existing use. This is called existing use value plus (EUV+). The incentive is the "+" of the "EUV+".

Residual Land Value (RLV): The RLV is a calculation of the MV of the site assuming planning consent for the proposed scheme of development using the residual method of valuation.

Royal Institution of Chartered Surveyors (RICS): The RICS is a professional body that accredits professionals within the land, property and construction sectors.

Section 106 (S106): Section 106 (S106) Agreements are legal agreements between Local Authorities and developers and are linked to planning permissions. They can also be known as planning obligations and can cover a wide range of matters that, in Tower Hamlets, include the provision of Affordable Housing as well as other contributions and requirements.

Appendix A: Appraisal Input Summary Sheet

The completion of this document is mandatory and is a validation requirement. A new version of this sheet must be submitted with every change in an applicant's viability position. An Excel template will be available.

Appraisal Component	Assumption	Quantum
Gross Development Value	Average Market Sales Values (£ per sq. m NIA)	
	Lowest Market Sales Values (£ per sq. m NIA)	
	Highest Market Sales Values (£ per sq. m NIA)	
	Average Affordable Sales Values (£ per sq. m NIA)	
	Car Parking Values (£ per space)	
	Ground Rents (£ per unit per annum)	
	Yield Applied to Ground Rents (%)	
	Commercial Rental Value 1 (£ per sq. m)	
	Yield Applied to Commercial Rental Value 1 (%)	
	Commercial Rental Value 2 (£ per sq. m)	
	Yield Applied to Commercial Rental Value 2 (%)	
	Gross Development Value (£)	
Costs	Construction Costs per sq. m GIA (£)	
	Construction Costs Total (£)	
	Professional Fees (% of construction cost)	
	Professional Fees Total (£)	
	Marketing Costs (% of construction cost)	
	Marketing Costs Total (£)	
	Disposal Fees (% of construction cost)	
	Disposal Fees Total (£)	
	Finance Cost (% of construction cost)	
	Finance Costs Total (£)	
	Developer Profit (£)	
	Contingencies (% of construction cost)	
	Contingencies (£)	
Developer Profit	Residential (Market): % on GDV	
	Residential (Affordable): % on GDV	
	Residential (Blended): % on GDV	
	Commercial: % on Cost	
	Internal Rate of Return (IRR): %	
Planning Contributions	Total CIL Liability: £	
	CIL Liability accounting for relevant reliefs: £	
	S106 Financial Contributions: £	
Residual Land Value	Residual Land Value (£)	
Benchmark Land Value and Acquisition Information	Land Acquisition Costs (£)	
	Benchmark Land Value (£)	

Appendix B: Formulas for application in reviews

Formula 1: To calculate the 'policy surplus' available for onsite affordable housing (or other policy requirements) at pre-implementation and mid-term (for phased schemes) review stages

$$\text{'Policy Surplus'} = ((A - B) - (C - D) - P)$$

Where:

A	Review Stage GDV as determined at the time of review
B	<ul style="list-style-type: none"> Application Stage GDV as determined at the time planning permission was granted; or Where it was agreed at application stage that there was a deficit against the BLV, a 'breakeven' GDV can be used, i.e. the application stage GDV can be inflated to the extent of the agreed deficit.
C	Review Stage Build costs as determined at the time of review
D	Application stage Build costs as determined at the time planning permission was granted
P = (A - B) * Y	Developer profit on change in GDV (£)
Y	Developer profit as a percentage of GDV (%) as determined at the application stage
(A - B)	Difference in GDV between time planning permission was granted and time of review
(C - D)	Difference in build costs between time of planning permission and time of review

Formula 2: To determine the amount of additional onsite affordable housing floorspace for pre-implementation and mid-term reviews

$$\text{'Additional London Affordable Rent Habitable Rooms Requirement'} = ((E * F) \div (A - B)) \div D$$

$$\text{'Additional Intermediate Habitable Rooms Requirement'} = ((E * G) \div (A - C)) \div D$$

Where:

A	Average value of market housing p/sq.m
B	Average value of London Affordable Rent housing p/sq.m
C	Average value of Intermediate housing p/sq.m
D	Average habitable room size for scheme (m ²)
E	Surplus profit available for additional affordable housing (as determined by Formula 1) (£)
F	Percentage of surplus profit available for additional affordable housing to be used for low cost rent housing (%) (with reference to Local Plan Tenure Split)
G	Percentage of surplus profit available for additional affordable housing to be used for intermediate housing (%) (with reference to Local Plan Tenure Split)

The additional social rented and intermediate habitable rooms figures will be used to determine those units identified in the Additional Affordable Housing Schedule to be converted to affordable housing.

Formula 3: To calculate the additional financial contribution payable to the Council at advanced review stages, towards affordable housing or other policy requirements not viable at application stage

$$\text{'Contribution'} = ((D - H) - P) \times 60\%$$

Where:

A	GDV achieved on sale of at least 75% of residential units and GDV from other parts of the development sold / let and other income receipts.
B	Estimated GDV for parts of the development that are yet to be sold/ let and other income sources.
C	<ul style="list-style-type: none"> Application Stage GDV as determined at the time planning permission was granted; or Where it was agreed at application stage that there was a deficit against the BLV, a 'breakeven' GDV can be used, i.e. the application stage GDV can be inflated to the extent of the agreed deficit.
D = (A + B) - C	The change in GDV at the time of review.
E	Actual build costs incurred at the time of review.
F	Estimated build costs for remainder of the development.
G	Total build costs determined as part of the assessment of viability at time planning permission was granted (or as determined in previous Review - e.g. early review).
H = (E + F) - G	The change in build costs at the time of Review, which is subtracted from the change in GDV to establish whether additional value has been generated as a result of increased values or reduced costs.
P = (A + B - G) * Y	Developer profit on surplus GDV (£)
Y	Developer profit as a percentage of GDV (%)
60%	Any surplus GDV, after deducting the developer profit on surplus, will be shared between the LPA and the developer on a 60:40 split in favour of the Local Planning Authority.

Formula 4: To calculate the 'advanced stage cap' which is the maximum additional affordable housing contribution payable at advanced stage reviews

$$\text{'Advanced stage cap'} = (((A * D) - (B * D)) * E) + (((A * D) - (C * D)) * F)$$

A	Average market housing values p/sq.m
B	Average low cost rent values p/sq.m
C	Average intermediate rented housing values p/sq.m
D	Average habitable room size for scheme (sq.m)
E	Low cost rent shortfall on-site (habitable rooms) (Determined at the time planning permission was granted or as updated following previous review)*
F	Intermediate housing shortfall on-site (habitable rooms) (Determined at the time planning permission was granted or as updated following previous review)*

* = Shortfall in the relevant tenure of affordable housing by habitable room in the consented scheme, when compared with the policy target and local plan tenure split.



Development Viability Supplementary Planning Document (SPD)

Report on Second Consultation

September 2017

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Section 1: Introduction

What is the Development Viability Supplementary Planning Document (SPD)?

- 1.1 Paragraph 173 of the National Planning Policy Framework (NPPF) requires that Development Plan Policies and Planning Obligations are considered in terms of their impact on the viability of a development.
- 1.2 The Development Viability SPD sets out a number of important measures the Council considers will:
 - Enhance public participation in planning;
 - Support the compliance of planning regulations and guidance;
 - Provide certainty to applicants and developers;
 - Help maximise the benefits of development for local people.
- 1.3 The SPD sets out the Council's requirements for Financial Viability Assessments (FVAs) to be made public and the process for assessing these appraisals. It will ensure the assessment of the viability of planning applications is efficient, consistent and transparent.
- 1.4 The document supports the Development Plan by providing further detail on how we will implement our planning policies where viability is an issue.

What is this Consultation Report?

- 1.5 This report explains the second consultation on the Draft SPD that took place from the 27/04/2017 to 08/06/2017 and how comments that individuals and organisations have made have been taken into account and how they have influenced changes to the SPD.
- 1.6 The consultation undertaken was done so in accordance with both local and regulatory requirements. The Council's local requirements are set out in our Statement of Community Involvement (SCI) (2012) which explains how the Council consults on planning policy documents and also on planning applications. The Council's Regulatory requirements arise from Town and Country Planning (Local Planning) (England) Regulations 2012.

Where to get more information

- 1.7 The draft Development Viability SPD and associated documents can all be viewed at our website:
<http://www.towerhamlets.gov.uk/viability>
- 1.8 Copies are also available by contacting the Infrastructure Planning Team at:

Infrastructure Planning Team
London Borough of Tower Hamlets
Mulberry Place
5 Clove Crescent
London
E14 1BY
Email: viability@towerhamlets.gov.uk
Tel: 020 7364 2343 / 0207 7364 1666

What happens next?

- 1.9 The SPD has now been subject to two consultations. Following this, the consultation responses received will be considered and the final version of the SPD will be formed and referred to the Mayor in Cabinet for approval to adopt. If adopted, the impact and effectiveness of the SPD will be monitored on an ongoing basis.

Section 2: Draft Development Viability SPD Consultation

- 2.1 The Council undertook an initial consultation on the SPD for a period of six weeks from 31/01/2017 to 14/03/2017.
- 2.2 The Council undertook a second consultation on the SPD for a period of six weeks from 27/04/2017 to 08/06/2017.

Who was consulted and how?

- 2.3 We consulted a wide range of residents, developers, land owners and planning agents on the draft Development Viability SPD. The parties consulted consisted of statutory consultees as well as parties who have been active in Tower Hamlets in the past few years and all parties on the Council's consultation list which included all of the parties who were consulted as part of the Council's Regulation 18 version of its new draft Local Plan.
- 2.4 The extent of consultation described in the paragraph above means the Council met the requirements of the Statement of Community Involvement (2012) (SCI) and the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.5 The draft SPD was accompanied by a Consultation Statement which outlined how the Council consulted on the document and how parties were able to make representations.
- 2.6 Copies of the SPD and supporting documents were made available at the Town Hall and the Council's Idea Stores and main Libraries.
- 2.7 In addition, the Localism Act 2011 requires co-operation between local authorities and a range of other bodies and organisations as an integral part of the preparation of planning policy and guidance. This is called the "Duty to co-operate". The Town and Country Planning (Local Planning) (England) Regulations 2012 and the

National Planning Policy Framework (2012) set out these prescribed bodies and further information on the need for local authorities to work with these bodies and also their neighbouring boroughs on strategic planning issues and cross boundary issues. The Council engaged with these bodies as part of the consultation.

Section 3: Representations on the Draft SPD

Responses received in respect of the consultation on the draft SPD

3.1 Eighteen formal representations were received in respect of the second consultation on the SPD, from the following parties:

- DVSPD01 - 4 Estates Forum
- DVSPD02 - Port of London Authority
- DVSPD03 - QUOD on behalf of Canary Wharf Group
- DVSPD04 - QUOD on behalf of One Housing Group working with Argent
- DVSPD05 - The Kingsbridge Estate Tenants and Residents Association
- DVSPD06 - Berkeley Group
- DVSPD07 - WYG on behalf of Galliard Homes Limited
- DVSPD08 - DS2 on behalf of Bishopsgate Regeneration Limited
- DVSPD09 - DS2 on behalf of The Ballymore Group
- DVSPD10 - Gerald Eve on behalf of Crest Nicholson London Ltd
- DVSPD11 - Carter Jonas on behalf of National Grid Property Holdings
- DVSPD12 - DP9 on behalf of Londonewcastle
- DVSPD13 - Natural England
- DVSPD14 - Aberfeldy New Village on behalf of Prime Place and Poplar HARCA
- DVSPD15 - Transport for London
- DVSPD16 - London Borough of Islington
- DVSPD17 – Greater London Authority
- DVSPD18 - Alpha Grove Freeholders Association
- DVSPD19 – Canary Wharf Community Organisation

3.2 The Council has endeavoured to distil the main points made in each representation and respond to each one. Please find attached at Appendix A, a schedule of the main points made in the representations received and the Council's response to each point.

3.3 A number of matters were raised consistently in the representations received. Please find below a selection of the matters consistently raised alongside the Council's response to these points:

Matter 1: The Council's move towards transparency is welcomed.

The Council's Response: The Council notes the general welcoming of the move towards transparency and considers this key in encouraging public participation in the planning process.

Matter 2: Transparency: The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. This is not considered a flexible enough approach to deal with legitimate claims of commercial sensitivity.

The Council's Response: The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny. The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. The Council does not consider that changes to the proposed SPD are required in this regard.

Matter 3: Estate Regeneration: Several Residents Groups have expressed a requirement for the SPD to contain an obligation for financial information for options set out at any options appraisal stage for an estate regeneration project to be published in accordance with the transparency requirements of the SPD.

The Council's Response: The 'Options Appraisal' stage of Estate Regeneration is not formally part of the planning process so requiring the publication of financial information relating to this stage would be challenging for the Council to enforce. The Council does however want to make sure residents are as informed as possible in such situations. The Council has amended the SPD to encourage the provision of such information, where possible.

Matter 4: The definition of 'substantial implementation': Representations were concerned that the reference to pre-implementation reviews being required if 'substantial implementation' is not completed within two years of permission is not consistent with the draft Mayor of London's Affordable Housing SPG.

The Council's Response: the Council has amended the SPD to clarify that the definition of substantial implementation is a matter that can be agreed between the Council, the applicant and where appropriate the Greater London Authority.

Matter 5: Benchmark Land Values: Some Representors consider the SPD is too definitive in terms of it describing that the Council would generally not expect the level of premium above Existing Use Value for benchmark land values to exceed 20%.

The Council's Response: The Council acknowledges the issue highlighted in establishing an appropriate level of premium. In the Council's experience a premium of 20% is most commonly applied hence the SPDs reference to this level of premium generally. The SPD has been amended to clarify that the premium above EUV that is applied will generally not be expected to exceed 20% but will be considered on a site by site basis.

Summary of the changes made to the SPD

- 3.4 A number of changes to provide further clarification have been made to the SPD following consultation, including:

- A number of minor grammatical and spelling changes have been made to make the document more consistent and easier to understand.
- A number of references to the Mayor of London's Affordable Housing and Viability SPG were made, to reflect the status of this document.
- Section 3 (Key Requirements) has been amended to reflect changes made to the SPD as described in this section.
- Paragraphs 4.1 and 4.2 have been amended to clarify the Council's approach to the "Threshold Approach" to Viability as set out in the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance.
- A new paragraph (4.3) has been added to encourage the provision of viability information relating to Options Appraisal stages of Estate Regeneration projects.
- A new paragraph (4.16) has been added to ensure, in accordance with the Development Plan and associated guidance that planning applications and associated FVAs appropriately account for available grant funding.
- Paragraph 4.14 has been amended to clarify that the Council appoints external consultants under a competitive tendering process.
- Paragraph 5.4 has been amended to describe that where an applicant considers elements of a submitted FVA should not be made publicly available, that an FVA that aggregates all of the information the applicant considers should remain confidential should also be submitted.
- Paragraph 6.29 has been amended to clarify how the Council will consider the level of premiums applicable above existing use values for Benchmark Land Values.
- Paragraph 6.30 has been amended and a new paragraph (6.31) has been added to clarify when Alternative Use Values can be used as a Benchmark Land Value and the information that should be submitted to support their use.
- A new paragraph (7.2) has been added to clarify the Council's approach to review Mechanisms in the context of the "Threshold Approach" to Viability as set out in the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance.
- Paragraph 7.7 has been amended to clarify that a definition of 'Substantial Implementation' can be agreed between the Council, the applicant and where appropriate the Greater London Authority.
- A new paragraph 7.8 has been added to clarify that Review Mechanisms can account for deficits against the Benchmark Land Value agreed at the application stage.

- Paragraph 7.13 has been amended to remove a reference to changes in market conditions being relevant to the undertaking of pre-implementation Review Mechanisms.
- Appendix A has been amended to add Planning Contributions to the Appraisal Input Summary Sheet.
- Appendix B: The formulas for Review Mechanisms have been amended to ensure they are consistent with the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance.

Summary of changes to supporting documents

3.5 The following amendments have been made to supporting documents:

SEA Screening Determination and Sustainability Appraisal Review (2017)

- This document has been reviewed. No substantial changes were made.

Appendix A - Detailed summary of Representations and Council response

	Representation	Councils Response
1	DVSPD01 - 4 Estates Forum	
2	The 4 Estates Forum welcomes Tower Hamlets Draft Development Viability guidance for its intention to provide the public with information necessary to scrutinise developers' Viability Assessments, which detail assumptions about costs and revenues when submitting planning applications. We support the aims, of maximising affordable housing provision, and enabling public debate about how revenues from developments are divided between different interests and public benefits.	Noted
3	<p>We are very concerned that the draft policy as it stands does not require social landlords and their developer partners to publish similarly detailed information about all possible options for the 'regeneration' of social housing estates - at the crucial 'option appraisal' stage, i.e., long before a decision is made on which option to submit a planning application for.</p> <p>This is a terrible omission, because it means that residents facing the possible demolition of their homes are unlikely to be given the detailed information necessary to scrutinise and judge all possible options for the future of their estates, or to suggest changes or alternatives. As a result, landlords could dismiss options, (or policies such as fully delivering a 'right to return') as 'not viable,' without publishing the assumptions and financial details to support such a conclusion.</p> <p>Therefore, we strongly urge the council to add the following policy to its Viability Guidance:</p> <p><i>Social landlords considering the redevelopment of estates where demolition of homes may be proposed will be required to publish full viability information at the option appraisal stage on all possible options</i></p>	<p>The 'Options Appraisal' stage of Estate Regeneration is not formally part of the planning process so requiring the publication of financial information relating to this stage would be challenging for the Council to enforce.</p> <p>The Council does however want to make sure residents are as informed as possible in such situations. The Council has amended the SPD to encourage the provision of such information, where possible.</p>

	<p><i>for the future of estates.</i></p> <p><i>Published information should include all the assumptions and financial details that a social landlord inevitably has to prepare to evaluate options itself, including: costs of planned maintenance and repairs, and possible refurbishments. In the event of redevelopments; costs of demolitions and compensation for tenants and owners; strategy for facilitating the right to return for tenants and owners, and the financial implications; sales values and rental yields of private units; affordable housing quantities and tenures, including housing costs for intermediate tenures and social/affordable rent levels; payments made by social landlords for affordable housing units; CIL & S106 contributions; developers' profits and social landlord surpluses; construction costs; professional fees; other costs.</i></p> <p><i>Elements that can be legitimately considered commercially confidential should be designated as such in accordance with the principles of this viability guidance. This policy is necessary to enable residents affected and the wider public to objectively evaluate all possible options' viability, costs and benefits, and to ensure that residents and landlords make fully informed decisions.</i></p>	
4	DVSPD02 - Port of London Authority (no substantive comments made)	
5	DVSPD03 - QUOD on behalf of Canary Wharf Group	
6	<p>Whilst the SPD consultation period post-dates the end of the GLA's consultation on the Homes for Londoners Affordable Housing and Viability Supplementary Planning Guidance ("the SPG") it is prior to publication of the final version. There are a several areas where the two documents whilst seemingly intended to be aligned lack consistency. These areas need to be addressed if the SPD is to be able to provide clarity on the approach the Council is to be taking to viability. It is also considered to be premature to finalise the SPD prior to the GLA adopting the SPG – this is noted in KR3. It would be appropriate for a further opportunity to consult on the LBTH SPD once the GLA SPG is published providing reassurance from an Applicant's perspective.</p>	<p>The Council is working closely with the GLA in order to ensure appropriately consistency between the respective documents.</p> <p>The Council has now undertaken two consultations on its SPD and does not consider that there is a need to undertake further consultations.</p>

7	<p>The approach being taken by LBTH in the SPD mirrors that of the GLA's Threshold Approach to Viability (KR3). However, as drafted, the application of this approach in the context of LBTH policy is unclear and requires clarification. KR2 advises that "all planning applications which trigger a planning policy requirement to provide affordable housing and the policy requirement is not met, are required to provide a financial viability assessment (FVA)". However the SPD does not define 'policy compliant' in the context of affordable housing. The GLA's approach in their SPG is clear, schemes meeting or exceeding 35 percent affordable housing without public subsidy are not required to submit viability information (para 2.3). In the context of LBTH policy the Local Plan sets a target of 35-50% (by habitable room), as currently worded it is unclear how the LBTH will be defining policy compliant which presents a challenge in interpreting and applying KR2 and KR21. Where 35% affordable housing is to be provided the SPD needs to be amended to ensure consistency with the approach taken by the GLA.</p>	<p>Now the GLA's position with regards to the threshold approach is clearer, the SPD has been amended to make the Council's approach clearer.</p>
8	<p>The approach to review mechanisms set out in KR21-KR25 is overly prescriptive and does not provide the flexibility to reflect scheme specific circumstances. For example, the approach taken to a high density scheme involving towers may be very different to one where there is partial estate regeneration or a build to rent scheme. The GLA approach is to recognise that there may be alternative approaches and forms of review mechanisms (para 3.53 of SPD)</p>	<p>The approach of the SPD in this regard is consistent with the approach set out in the Mayor of London's Affordable Housing and Viability SPG.</p>
9	<p>Where a scheme is not achieving 35% and it is considered necessary for a review to be imposed there must be flexibility for the individual circumstances of schemes coming forward to be reflected in the approach and the triggers. It is therefore important to consider the appropriateness of review mechanisms to the scheme specific circumstances particularly where they are complex in nature. This will also enable concerns with Formula 3 to be addressed as it will ensure that the complex funding and programme arrangements for high density schemes and those in Opportunity Areas will be given proper consideration and therefore promote the delivery of homes.</p>	<p>The Council will work with applicants/developers in respect of review mechanisms drafted in specific S106 agreements but consider it important to set out a framework in the SPD for the basis of the formation of these parts of the agreements.</p>

10	<p>Paragraph 7.6 sets out the timings of review mechanisms including pre-implementation review if substantial implementation hasn't occurred within 24 months. The level of implementation needs to be amended for consistency with the SPG. Page 15 of the SPG states "an early review would apply where an agreed level of progress on implementing the permission (this will be agreed by applicant and LPA, and the Mayor where relevant, on a site by site basis) is not made within two years of the permission being granted." The LBTH SPD needs to therefore be amended on this basis.</p>	<p>Noted, the SPD has been amended to provide greater clarity in terms of 'substantial implementation' being a matter that can be agreed between the Council, the applicant and where appropriate the Greater London Authority.</p>
11	<p>In the case of schemes delivering 35% affordable housing, a review should only be imposed where the agreed level of progress review is triggered at the two year trigger not an end of scheme review, this is clearly set out in Annex A of the SPG where near end of development reviews are clearly limited to schemes progressing through Route A. Consistency with the approach taken by the GLA is essential. The proposal to require Mid Term Reviews is inconsistent with the approach taken by the GLA and is not considered to work in practice. The financial dynamics of multi-phase schemes are very complex which is not reflected in KR23. This should be deleted. This is not a GLA requirement and is not workable in practice.</p>	<p>The Council has updated the SPD to clarify that the approach to review mechanisms where the 'Threshold' approach applies will be consistent with the approach described in the Mayor of London's Affordable Housing and Viability SPG.</p>
12	<p>Both KR11 and KR14 of the Key Requirements state that FVAs cannot demonstrate that schemes as proposed are technically unviable and that they may be adjusted in terms of impact on the scheme's profit. Whilst this may be helpful as part of sensitivity testing it is not appropriate for the baseline position to be artificially amended to evidence a scheme viability in excess of what is able to be evidenced using robust inputs and assumptions. These requirements should be removed and the formulas set out Appendix B amended to reflect agreed profit thresholds. Furthermore it is not clear as to how the Council consider an Applicant will be able to meet the requirement to demonstrate a scheme is deliverable (KR12). Further guidance is required if this is to be retained as a requirement.</p>	<p>The requirement of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit.</p>

13	<p>The intention which underlies KR8-10 relating to transparency of information is understood and shared by Canary Wharf Group albeit there are circumstances where it is essential to limit disclosure of aspects of a viability assessment, particularly where this may involve live commercial or contractual negotiations (e.g. rights of light negotiations). Ensuring development is not prejudiced through the release of information which is commercially sensitive is critical to supporting the key objective of the NPPF which is to encourage development and not frustrate it. Further clarification should be recognised in KR10 as to when information will be treated in confidence to avoid this being negotiated on individual applications.</p>	<p>The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. As such, the Council does not consider that changes to the proposed SPD are required in this regard.</p>
14	<p>KR25 sets out the share of surplus 60.40 in favour of the Council. A 50/50 apportionment would appear to be more equitable and ensure a clear incentive to maximise outcomes.</p>	<p>The approach of the SPD to review mechanisms is consistent with the approach set out in the Mayor of London's Affordable Housing and Viability SPG.</p>
15	<p>There are also a number of areas where the SPD fails to mirror the flexibility being afforded by the GLA regarding the approach to viability, for example their draft SPG clearly differentiates Opportunity Areas where a bespoke approach is encouraged in relation to viability and tenure mix (para 3.55-3.57). We would encourage further alignment on critical points such as this.</p>	<p>The Council may consider applying flexibility to tenure splits in Opportunity Areas and this will be assessed on a case by case basis. It is not necessary for this to be reflected in the SPD document.</p>
16	<p>Against this background the SPD should be amended to:</p>	
17	<ul style="list-style-type: none"> • Remove the reference and link to the London borough Viability Protocol (para 1.7). This document has no material weight and has not been subject to any formal consultation nor is it a document supported by the GLA. 	<p>The Council does not consider this necessary.</p>
18	<ul style="list-style-type: none"> • Provide clarity in relation to KR2, KR3 and KR21 that, consistent with that provided by the GLA, where 35% affordable housing is to be provided: <ul style="list-style-type: none"> ○ Viability information will not be required; 	<p>The SPD has been updated to provide greater clarity concerning the approach to the 'Threshold Approach'.</p>

	<ul style="list-style-type: none"> ○ KR22 will only be required where agreed progress has not been achieved within 2 years; and, ○ KR23 and KR24 do not apply. 	
19	<ul style="list-style-type: none"> ● Allow flexibility for alternative review mechanisms to be agreed to reflect site specific circumstances. 	The Council will work with applicants/developers in respect of review mechanisms drafted in specific S106 agreements but consider it important to set out a framework in the SPD for the basis of the formation of these parts of the agreements.
20	<ul style="list-style-type: none"> ● Delete KR11, KR12, KR14 and KR23. 	The Council has considered the Key Requirements and made appropriate amendments.
21	<ul style="list-style-type: none"> ● Be consistent with the approach being promoted by the GLA in relation to Opportunity Areas, ensuring flexibility in relation to viability and tenure mix. 	The Council may consider applying flexibility to tenure splits in Opportunity Areas and this will be assessed on a case by case basis and in the context of the Development Plan. It is not necessary for this to be reflected in the SPD document.
22	DVSPD04 - QUOD on behalf of One Housing Group & Argent	
23	<p>Development Viability in Opportunity Areas & Estate Renewal – It is important to consider the planning policy requirement for affordable housing in the context of estate renewal schemes. We submitted representations on this point previously within the Local Plan representations, seeking amendments to policy H2 to ensure flexibility regarding the approach to viability for this type of development. More recently, paragraphs 3.55-3.57 of the Draft GLA Housing and Viability SPG also set out the approach to Opportunity Areas and housing zones. In these circumstances LPAs are encouraged to consider a bespoke approach to affordable housing taking account the nature of specific sites. The approach should be informed by:</p> <p><i>“significant research and an in-depth understanding of the area, its strengths and weaknesses, and how to deliver a successful place”</i></p> <p>The GLA threshold approach to viability then allows Opportunity Area sites to be compliant via delivery of the right mix of homes for the area rather than the standard mix required for smaller sites. We would suggest that the Tower Hamlets SPD be amended to include a similar approach to the GLA SPG. As such, and subject to a thorough analysis, Opportunity Area sites would be enabled to deliver the right mix of housing types and tenures to ensure a successful new place.</p>	The Council may consider applying flexibility to tenure splits in Opportunity Areas and this will be assessed on a case by case basis and in the context of the Development Plan. It is not necessary for this to be reflected in the SPD document.

24	Pre-application advice – We welcome the flexibility in regards to the level of detail that can be provided at the pre-application stage in respect of draft FVA given the scheme evolution until planning submission.	Noted.
25	Threshold Approach to Viability. We are supportive of the introduction of a threshold approach to viability that enables schemes exceeding the threshold to progress quickly through planning without the need for detailed viability information or comprehensive review mechanisms. As currently worded the GLA SPG sets the threshold at 35% by habitable rooms, however the LBTH Local Plan sets a target of 35-50% by habitable room. It is therefore unclear how the LBTH is seeking to amend their policy to be in accordance with GLA wording given the policy compliant positions are different. We would welcome further understanding of how the LBTH seek to address this current differential between the two approaches.	The Council has updated its SPD to provide clarity in this regard.
26	Transparency of Information – We welcome transparency of information regarding viability. Whilst the SPD notes that there are limited circumstances where disclosure of an element of a viability assessment would cause harm to the public interest to an extent that it is not outweighed by the benefits of disclosure (KR10), it does not say explicitly what they might be. Some viability information is particularly commercially sensitive and cannot be made publicly available. This includes information that could prejudice the commercial position of a developer in respect of a future settlement for development related compensation (i.e. rights of light). This is particularly relevant on large mixed regeneration schemes where land interests may also need to be acquired.	<p>The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. As such, the Council does not consider that changes to the proposed SPD are required in this regard.</p>
27	Review Mechanisms – We are concerned with the prescriptive approach to review mechanisms within the SPD. The review mechanism currently drafted assumes a one size fits all approach and should recognise the unique nature of schemes including build to rent and estate renewal. It is important to consider the individual circumstances of schemes coming forward and review triggers. For example estate regeneration projects	The Council will work with applicants/developers in respect of review mechanisms drafted in specific S106 agreements but consider it important to set out a framework in the SPD for the basis of the formation of these parts of the agreements.

	often need to fund large upfront infrastructure and replacement homes costs. In these cases funders need certainty on the scheme details for the period over which they will recoup the initial investment, this could be over a large number of years if the initial costs are high. It therefore important to consider the appropriateness of review mechanisms on these types of schemes as well as the phasing of review mechanisms.	
28	Build to Rent – We welcome recognition of the Build to Rent tenure in paragraphs 6.33-6.34. It is important to consider the appropriate affordable housing tenures that can be provided alongside Build to Rent e.g. Affordable Private Rent set out in the Housing White Paper consultation. It is also important to understand the need for all homes to be delivered under single management and as such delivered as discounted market rent managed by a build to rent provider. It is important to consider the covenants and approach to viability for Build to Rent schemes and how review mechanisms need to be flexible to this type of tenure.	Noted. The Council is monitoring both national and regional approaches to the treatment of Build to Rent development and will develop its approach accordingly in due course.
29	Share of Surplus – We would question whether it is appropriate that any surplus determined as a result of the viability review is split 60/40 in favour of the Council. A 50/50 apportionment would appear to be more equitable and ensure a clear incentive to maximise outcomes. In some cases such as estate regeneration it may also be appropriate for the Council share to be reinvested on-site in additional affordable housing outcomes.	The approach of the SPD to review mechanisms is consistent with the approach set out in the Mayor of London’s Affordable Housing and Viability SPG.
30	Appraisal Input Summary Sheet – It is important that the sheet also include the required Community Infrastructure Levy and fixed s106 contributions. These are currently excluded from the summary sheet. We note there is a requirement to submit a new sheet with every change in an applicant’s viability position, however some flexibility here may be appropriate given the likely numerous minor updates to the scheme throughout the determination process. We agree that a summary should be issued once the viability position is agreed and the scheme is brought forward to committee.	Noted. Estimated CIL and S106 contributions have been added to the appraisal inputs summary sheet.

31	<p>Formula 2 – This refers to Additional London Affordable Rent and additional intermediate tenure. However it is important to consider the individual scheme circumstances and what the appropriate on-site tenures would be having regard to ensuring mixed and balanced communities on-site. Therefore there should not be a London average value and the value should be based on individual scheme specifics.</p>	<p>The formulas included are consistent with the Mayor of London's Affordable Housing and Viability SPG.</p>
32	<p>Formula 3 - This formula contains prescriptive calculations to determine profit e.g. P1 – profit achieved up to point in review. However it is important to consider that estate regeneration schemes often have a large amount of enabling and infrastructure works early on in the development programme. Secondly there are complex funding and programme arrangements for this type of project, therefore levels of profit are difficult to determine at a specific point in time. In essence the profit within an estate regeneration scheme is the risk margin required to ensure deliverability, often over many years. As such it is essential that this be carefully assessed so as not to risk delivery.</p>	<p>The viability process at the application stage and at review stage can account for enabling and infrastructure works early in a development programme, as well as funding and programme arrangements.</p>
33	<p>Deliverability –Both KR11 and KR14 of the Key Requirements state that FVAs cannot demonstrate that schemes as proposed are technically unviable and that profit should be adjusted to show a viable scheme. Estate regeneration schemes are inevitably financially challenging and often need to proceed on a basis that is not technically viable using standardised measures. In these circumstances there is in reality no single basis for the decision to proceed (i.e. it is not an assumption on a profit reduction or value growth). Instead, a wide range of factors are considered in the round including place making growth, cost targets, phasing opportunities funding options and many other issues. As such there is no single scenario and the SPD should be amended to remove this requirement.</p>	<p>The requirement of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit..</p> <p>The SPD does emphasise that growth projections can be included in an FVA to account for any deficit.</p>
34	<p>Estate Regeneration – We would in general note that it may be appropriate for the SPD to address some key points specific to estate regeneration. This could include for example the need to fund the costs of</p>	<p>The Council does not consider there is a need for the SPD to refer to these matters as it would risk making the SPD overly prescriptive. The Council's general approach to considering submitted Financial Viability Assessments</p>

	replacement homes in the first instance prior to considering what potential affordable housing can be delivered in the net additional homes.	means these key points can be picked up as part of the application process.
35	DVSPD05 - Kingsbridge Tenants and Residents Association	
36	The Kingsbridge Estate Tenants and Residents Association (KTRA) welcomes the draft Development Viability guidance for its intention to enable public scrutiny and debate.	Noted.
37	<p>The Kingsbridge Estate would kindly request an addition to this draft to: <i>'Require social landlords considering the redevelopment of estates where demolition of homes may be proposed to publish full viability information at the option appraisal stage, for all options developed by residents or put to residents for the future of estates, ie, long before a decision is made on submitting a planning application for a single option.</i></p> <p><i>Published information should include all the assumptions and financial details that a social landlord has to prepare to evaluate options, including: costs of planned maintenance and repairs, and possible refurbishments. In the event of redevelopments; costs of demolitions and compensation for tenants and owners; strategy for facilitating the right to return for tenants and owners, and the financial implications; sales values and rental yields of private units; affordable housing - quantities, tenures, rent levels, costs, and values; CIL & S106 contributions; developers' profits and social landlord surpluses; construction costs; professional fees etc. The general principles of this viability guidance apply to any information considered commercially confidential.</i></p> <p>Only this addition can implement the accepted policy principles - as set out in London Guidance and the Local Plan - that residents facing the potential demolition of their homes are given the information necessary to evaluate all the options for the future of their estates, make informed decisions, and express their views.</p>	<p>The 'Options Appraisal' stage of Estate Regeneration is not formally part of the planning process so requiring the publication of financial information relating to this stage would be challenging for the Council to enforce.</p> <p>The Council does however want to make sure residents are as informed as possible in such situations. The Council has amended the SPD to encourage the provision of such information, where possible.</p>
38	DVSPD06 - Berkeley Group	
39	It is acknowledged that BLV's should reflect policy requirements, planning obligations and CIL charges and therefore BLV should be negotiated on a site by site basis.	<p>This is noted.</p> <p>The Council consider that generally the most appropriate way to ensure</p>

		this is via adopting an 'Existing Use Value plus' approach however the SPD does allow for a range of approaches.
40	The preferred approach to use EUV+ to establish a BLV is considered too rigid and inconsistent with NPPG. We consider that there should be flexibility in how BLVs are established and that a combination of approaches (including AUVs and market evidence) would assist in providing greater certainty. This is particularly relevant where an EUV is generating a very low land value which is unrealistic and inconsistent with comparable market evidence and would not incentivise a landowner to sell.	<p>The Council has made a minor amendment to the section relating to the formation of Benchmark Land Values to clarify where an EUV+ approach might be appropriate and where an AUV approach might be appropriate.</p> <p>The Council has concerns over the use of market evidence in establishing BLVs due to the potential for the individual circumstances of other sites to be inappropriately imported to apply to another. In addition, the basis for forming Benchmark Land Values in FVAs is different to the basis on which a party bidding for a site will establish the bid amount.</p> <p>The SPD does state that it will only accept purchase price or market value as an approach where these figures fully reflect policy requirements.</p>
41	<p>The proposal to cap the premium at 20% should be evidenced and whilst the wording in the SPD seems to suggest that the cap is not an absolute it is likely that decision makers may adopt this approach in any event. As such, we consider it would be helpful if the SPD provided further clarity on the approach to agreeing the appropriate level of premium and that this could be higher than 20% if supported by evidence. We appreciate there is a lack of adopted guidance on how appropriate premiums are calculated but market evidence can be helpful in this regard as suggested in NPPG.</p> <p>Recent Appeal Decisions have shown that in some cases the premium can be in excess of the 20% as set out by the SPD. Landowners will only sell and make land available for housing if they are incentivised. The dependence on EUV+ will prevent sites coming forward and hinder housing delivery, especially on those sites which have low EUV's and a cap on the level of premium. This will be particularly relevant for all St William sites which have very unique characteristics - where flexibility will be paramount to ensure the re-development of these redundant gas holder sites.</p>	The Council acknowledges the issue highlighted in establishing an appropriate level of premium. In the Council's experience a premium of 20% is most commonly applied hence the SPDs reference to this level of premium generally. A small addition has been made to clarify that the level of premium that should apply will be considered on a site by site basis.
42	An AUV helps to provide more context in terms of what is an appropriate	The Council considers it important that appropriate guidelines are set out

	land value and is very relevant to a land owner in seeking the highest sale price. The removal of the requirement within the SPD to have a permission in place to 'prove' an alternative use is welcomed, however it would be beneficial if the updated criteria contained in KR19 were less prescriptive. The need to prepare an alternative proposal to an equivalent level of detail is unduly onerous and will incur significant further costs and cause delays to the application process. We consider that a site layout plan, schedule of accommodation and relevant costs/values should be sufficient to determine the validity of an AUV.	in terms of how an AUV can be formed. The SPD has been amended to clarify the information the Council will generally require to support an AUV benchmark.
43	The NPPF makes it clear that a competitive return to a willing developer should be provided to enable a development to be 'deliverable'; the level of profit achieved by developers is dependent on a number of factors including investment risk and market conditions. The SPD should acknowledge that in instances where a Viability Assessment suggests a scheme to be technically unviable then the onus will be on the developer to demonstrate how the development can be delivered (e.g. using growth forecasting) rather than a requirement to reduce profit expectation. This is a more proactive approach and would remove the risk of the development not coming forward.	The requirement of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit. This requirement is not intending to replace the need for the adjustment of planning obligations as described by the NPPF. The SPD does emphasise that growth projections can be included in an FVA to account for any deficit.
44	We consider that on larger phased developments viability appraisals should be modelled using an IRR based approach. This is the most accurate way in which to assess large scale development and it would be helpful if this was referenced in the SPD.	The SPD makes allowances for the use of an Internal Rate of Return approach.
45	Typically, on longer term developments, developers have to invest significant sums for site preparation and provision of early infrastructure, as well as CIL payments. The inclusion of review mechanisms is likely to increase the cost of capital as it is seen as an increased risk by funders. Therefore, any review must fully account of cost increases, start at the position that the development is not in deficit, and be capped at the outset so that the full risk is known to the applicant and their funders. Where growth assumptions are included in the assessment, we do not think it is reasonable to include a review mechanism as this would effectively be double counting.	The Council will work with applicants/developers in respect of review mechanisms drafted in specific S106 agreements but consider it important to set out a framework in the SPD for the basis of the formation of these parts of the agreements.
46	Where a review mechanism is secured on larger developments, it is	The approach of the SPD to review mechanisms is consistent with the

	critical that a review is triggered per phases as opposed to Advance Stage Reviews as proposed.	approach set out in the Mayor of London's Affordable Housing and Viability SPG.
47	As it is the developer that makes significant early investment and takes any risk associated with development, any surplus generated should be calculated in a way that does not act as a disincentive to the developer.	The approach of the SPD to review mechanisms is consistent with the approach set out in the Mayor of London's Affordable Housing and Viability SPG.
48	In terms of transparency, many assessments include information which is commercially sensitive. For example, this could include allowance for acquisition of third party land, rights of light or other information that would severely compromise the applicant's commercial position, therefore applicants should not be compelled to allow all details of sensitive information to be published publically. This is in line with previous FOI decisions (which recognises that some information is commercially sensitive. We do however, agree that it would be helpful to provide a non-technical executive summary of the viability assessment explaining the key factors and conclusions. On this basis it would not be unreasonable to request that the Council should also agree full transparency of its review of viability and advice from advisors including (for example) instructions to consultants.	<p>The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. The Council firmly considers that changes to the proposed SPD are not required in this regard.</p>
49	DVSPD07 - WYG on behalf of Galliard Homes Limited	
50	Paragraph 4.1 states schemes proposing off site or cash in lieu contributions are not suitable for a threshold approach. However, we believe that the threshold approach should be applied in such circumstances to promote commercial delivery of projects and equally in the interests of consistency, fairness and to promote certainty so that applicants may have confidence in the process. Off-site and cash in lieu scenarios should be equally bound by the same threshold as on-site provision.	The Council disagrees with this point. Emphasis should be placed on providing an incentive to deliver affordable housing on site to encouraged mixed and balanced communities.
51	KR1: The principle of submitting a draft financial viability assessment (FVA) at pre-application stage in order to minimise delay in decision making during the application process is supported. However, in practice this may not be possible on many sites due to the complexities involved, design implications effecting key components within the scheme and unknown input/outputs at that pre-application stage. Not only might this be premature when key details are uncertain, it may create a false	<p>The SPD aims to encourage early submission of viability information to lessen the likelihood of viability discussions causing delays in decision-making. It does not require the submission of viability information at the pre-application stage.</p> <p>The SPD acknowledges that the levels of detail that can be provided will vary from scheme to scheme. The Council does not consider any change</p>

	impression of delivery, raising expectations which, upon further review and consolidation, may not be achievable leading to subsequent frustration and delay. Further acknowledgement to this affect needs to be made within the final SPD.	to the document is necessary in this regard.
52	Current experience has demonstrated that there is no in-house experience available to discuss viabilities, and officers need to approach 3rd party consultants to act on their behalf. Clarity is needed as to how this is will operate. Also, if external advice is received, clarity is needed as to how this will be reported, acknowledged and weighted in affordable housing negotiations.	<p>The Council has two members of staff who sit in the Council's Viability Team and has experience in dealing with matters of viability.</p> <p>The Council has a process for using external consultants. This process needs some flexibility to ensure it can react to scheme specific circumstances and wider approaches to viability. Therefore, the Council does not consider it appropriate to provide fine grained detail on its process for appointing and using external consultants in the SPD, however the Council's Development Management and Viability Teams are able to answer any queries and applicant may have about the process on a case by case basis.</p>
53	It should only be acceptable to submit a draft FVA once certainty in proposed quantum and design together with other key inputs and outputs have been established by the applicant and agreed with the Council. The cost of instructing a consultant to provide a viability appraisal before the principle of scale and massing of a scheme represents an unnecessary expenditure. It should be noted, that our experience of financial viability assessments is that they are only usually finalised toward the end of the design stage, prior to submission. This is owing to fluctuations in inputs/outputs as a consequence of the design stage process and key decisions being made on the final scheme. For example, a scheme proposing a multi-storey tower could have a significant variation in building costs if there were a simple change in fenestration material, ultimately affecting an affordable housing offer.	This is noted, although the SPD acknowledges that the levels of detail that can be provided will vary from scheme to scheme. The Council does not consider any change to the document is necessary in this regard.
54	KR8 which states that FVAs that support pre-application discussions will be treated as confidential is also supported.	Noted.
55	Paragraph 4.1 states "where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset,	The Council considers the SPD provides enough clarity in this regard in that it says it applies to 'designated heritage assets' as per the requirement

	an FVA may be required to be submitted to demonstrate that the proposal is securing the heritage asset's optimum viable use." In the interests of clarity to all parties, applicants, consultants, council officers, statutory consultees and the public, clarification is required to establish the extent to which this applies, i.e. that it only applies to any scheme in the setting of a heritage asset, or just on listed buildings or within conservation areas.	described in paragraph 134 of the National Planning Policy Framework.
56	Further to KR9, stating the full FVA and Executive Summary and any subsequent revisions will usually be published, and KR10 which refers to there being limited circumstances that may restrict the disclosure of an element of a viability assessment, the need for transparency and public confidence in the planning process is supported.	Noted.
57	The commercial sensitivity of some elements of the information cannot be emphasised enough, in that the disclosure of some financial information may be used by third parties to raise costs or prejudice and undermine existing financial agreements, compromising the ability of a scheme to be delivered in the form applied. Such a scenario may lead to costly delays in bringing sites and housing forward, additional costs that may ultimately adversely affect the viability of the scheme and of the redevelopment of the site, adversely affect regenerative benefits or even prevent delivery of underused resources. The aggregation of costs may not resolve such potential conflicts and a more flexible approach to allow for restricted disclosure of sensitive information should be incorporated.	<p>The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public and can be aggregated to protect legitimate claims of commercial sensitivity. The Council firmly considers that changes to the proposed SPD are not required in this regard.</p>
58	KR13 It is agreed the Residual Land Value methodology should be applied to undertake viability assessment and this approach is supported (para. 6.1).	Noted.
59	Paragraph 6.16 the suggestion that marketing costs for larger developments is generally expected to be lower, due to economies of scale, is unfounded and offers a narrow view on the marketing requirements and costs for larger schemes. Tougher economic pressures generally require great incentives to sell schemes.	Whilst the Council considers economies of scale in terms of marketing costs will apply in many instances, the SPD is not absolute in this regard.

60	Paragraph 6.17 the principle of the Council providing assistance in the calculation of likely financial contributions at pre-application stage is welcomed.	Noted.
61	KR18 (para. 6.30) accepts Benchmark Land Value will normally apply the Existing Use Value plus a maximum premium of 20%.	The SPD does not describe that a maximum premium of 20% applies. It states that premiums will generally not be expected to exceed 20%, in line with the Council's experience on the matter.
62	KR19 the use of Alternative Land Values as a Benchmark Land Value is supported where the Council accepts that a planning permission for the ALV is not necessary. Such an approach would be particularly onerous, expensive and time consuming. Where the document states that a "...detailed alternative proposal is required to be worked up..." clarification is sought that this only applies to the financial viability appraisal and not the submission of equivalent planning application documents.	Noted. Clarification has been provided in the SPD.
63	KR22 (para. 7.11 and 7.12) further definition of substantial implementation is required. Are all the works specified within para. 7.12 required to be completed or commenced where they apply? This requirement would appear particularly onerous and effectively creates a 2-year planning permission. Large sites are more likely to involve complex land assembly arrangements, be subject to widespread contamination and other mitigation site preparation requirements and beholden on the discharge of pre-commencement conditions. All of these will cumulatively put pressure on the ability to achieve an undefined point in the programme of development which would have major implications for the financial structure of the whole scheme. Further definition of quantum thresholds in regard to phased development is also required. Phased developments may vary in size and may involve some parallel works.	Noted, the SPD has been amended to provide greater clarity in terms of 'substantial implementation' being a matter that can be agreed between the Council, the applicant and where appropriate the Greater London Authority.
64	Paragraph 7.13 regarding the re-allocation of private units in an original scheme to affordable housing in line with the Council's required tenure split will have several serious implications for the ability of large schemes to commit to off-plan sales, often referred to as being at 100% within most independent viability assessments conducted on behalf of the Council.	The Council notes this point. The Council will be able to consider how to provide additional affordable housing identified via a review with regard to site specific circumstances but notes that delivering affordable housing on-site is important to achieving mixed and balanced communities.

	High levels of off-plan sales are often identified as being required by funders to large developments. Restrictions on that flow of funds may have serious implications on the finances affecting delivery of schemes. Such requirements are unpractical, unworkable and would seriously affect the financing position of any development, causing uncertainty, undermining confidence of financiers and destabilising the prospect of developments coming forward.	
65	There are design implications for the requirement to not only re-assign areas from private to affordable housing but potentially change the unit sizes and mix. This involves revising access arrangements and communal areas which Registered Providers require to be dedicated entirely per tenure under their demise for management and financial reasons. Floorplates and layouts would be affected as would servicing, mechanical, electrical and plant design, private and communal amenity space requirements and external elevations. There is no mechanism under an existing permission to institute such changes and would necessitate further planning applications, including under s73, at additional cost to the developer, needing to engage a whole new consultant team, delaying the development. Any such changes would also require further S106 agreements to be signed which from practical experience encounter significant delays with legal services and reporting to planning committee.	See response above.
66	By example, a developer only receives the benefit of completions, typically, once the entire tower is complete. There is very little opportunity to re-assign floorplates or units within a tower as the policy suggests. Further consideration needs to be made regarding the ramifications of this policy.	Noted, see response above. The Council would highlight that the policy basis for this approach is set out in the Council's existing and emerging Local plans.
67	Time, delays and uncertainty undermine market and funders' confidence, hindering developers' delivery of much needed housing within the borough. The provision of additional commuted sums as a result of any review to the Council for affordable housing or to meet planning obligation requirements previously accepted as being unviable would alleviate all of	Noted, see response above.

	the above.	
68	The above comments equally apply to KR23 Mid-term reviews (para 7.17). KR24 Advanced stage reviews (para. 7.20) acknowledges the outcome of this review will typically be a financial contribution towards offsite affordable housing provision or other policy requirements which is welcomed.	Noted, see response above.
69	Paragraph 7.21 refers to contributions payable in the event of a surplus at advanced stage reviews. Appendix B stipulates 60% of surplus profit to be paid the Council. Whilst it is recognised why the Council would seek to avoid there being a financial incentive to provide off-site provision, the formula to provide the Council with an increased proportion of contributions greater than returns for the applicant, is wrong. An equitable split in any uplift in returns of 50/50, up to a capped amount, would be fair and reasonable and not lead to accusations that the Council were profiting from development in such circumstances beyond that attributable to the developer.	The approach of the SPD to review mechanisms is consistent with the approach set out in the Mayor of London's Affordable Housing and Viability SPG.
70	DVSPD08 - DS2 on behalf of Bishopsgate Goods Yard Limited DVSPD09 - DS2 on behalf of The Ballymore Group	
71	Pre-application advice - The Ballymore Group/BGY Regeneration Limited raise the question as to why an appraisal inputs summary sheet is needed to validate a planning application. All key inputs would already be set out in the detailed financial viability assessment and the council's independent assessor would have access to the live ARGUS file which would contain these key inputs.	The appraisal inputs summary sheet is required to enable the Council to better capture information contained within submitted Financial Viability Assessments. This will ensure the Council's approaches to viability are better informed generally. The Information Requirements described in the SPD are to encourage and assist with public participation through the course of a planning application. The Council considers it key that an executive summary be submitted as a validation requirement to enable effective public participation.
72	Transparency - The shift towards transparency is welcomed. The Ballymore Group are very willing to share certain information as part of the planning process be it through the publication of information or through presentations on viability matters to Officers and Members.	The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to

	<p>Certain information will not be made available; for example, information relating to funding agreements, rights to light liabilities or joint venture agreements. There is a real risk that too onerous application of this element of the SPD threatens a developer's commercial interests which is contrary to the tests as set out in the 2014 Environmental Regulations.</p>	<p>scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. The Council firmly considers that changes to the proposed SPD are not required in this regard.</p>
<p>73</p>	<p>Deliverability - The SPD states that FVAs cannot demonstrate that schemes as proposed are technically unviable and that the applicant should demonstrate how their proposed scheme is delivered. Paragraph 6.2 goes on to further state that where schemes are identified as unviable at the proposed level of planning obligations, the level of profit allowed for should be adjusted to the extent that the scheme as proposed becomes viable so that it will help identify the level of profit/loss the applicant/developer is prepared to accept on a current day basis.</p> <p>The Ballymore Group/ BGY Regeneration Limited are willing to provide this as a sensitivity analysis within the FVA, however, the NPPG states that appraisals should be run on a current day basis, without growth, unless where a scheme requires phased delivery on the medium and longer term.</p> <p>As emphasised in the previous submitted representations The Ballymore Group and their funders would be unwilling and unable to reduce their profit expectations at the expense of delivering planning obligations nor should they be asked to in accordance with the NPPF which explicitly states a competitive return to a willing developer should be provided to enable the development to be deliverable. By reducing the profit expectations to satisfy LBTH that the development is deliverable simply increases the risk of the development not coming forward in the foreseeable future. Not all sites will be technically viable on a present-day basis. It is the applicant's decision to commit to the proposed level of planning obligations, should this indicate in the current day viability appraisal that the scheme is unviable, this doesn't necessarily mean that the scheme will be unviable in the foreseeable future. This is also key for determining viability reviews as the level of profit will need to be agreed at the date of consent so that once a viability review is undertaken it will still allow for a competitive return to the developer.</p>	<p>The requirement of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit..</p> <p>The SPD also emphasises that growth projections can be included in an FVA to account for any deficit.</p>

74	<p>Build costs - The Ballymore Group/ BGY Generation Limited believe wherever possible such assessments should be benchmarked against other similar projects, however, benchmarking against BCIS or Spon's is only appropriate for smaller more straight forward projects and would not be appropriate for developments such as the Bishopsgate Goodsyrd scheme. The SPD states that professional and marketing fees adopted at the higher end of typical ranges would be expected to be associated with higher values. This is not always the case, large regeneration sites that have relatively low values are typically expected to have higher professional fees due to the complexity of the scheme. Professional fees and marketing fees should be assessed on a site by site basis.</p>	<p>Noted. The SPD is flexible enough so that the Council can take account of site specific circumstances.</p>
75	<p>In regards to abnormal development costs, whilst it is accepted that some abnormal costs are likely to result in a lower land value than could be achieved on a site, the SPD does not recognise that not all abnormal costs are known by the applicant until the land has been purchased and detailed site investigations have been carried out. Furthermore, the land value, as stated in the NPPF, should still provide a competitive return to the landowner in order to bring forward the site for development and this should be taken into consideration when considering abnormal costs and site value together. Where abnormal costs take the land value below the landowner's reasonable expectation, it may only be flexibility that is permissible in planning gain contributions, that ultimately allows the site to be delivered.</p>	<p>The Council considers the wording of the SPD to be appropriate in respect of the impact of abnormal costs on land value.</p>
76	<p>The Ballymore Group/BGY Regeneration Limited disagree with the statement in the SPD that marketing costs for larger developments, economies of scale are expected to occur, resulting in proportionally lower costs. Large developments involve significantly greater levels of marketing in order to meet the off-plan sales target imposed by funders such as banks to release developer funding. This can involve overseas marketing, marketing suites and greater levels of advertising so that the development stands out from the many other developments being marketed over a long-period of time, which is the case for Canary Wharf</p>	<p>Whilst the Council considers economies of scale in terms of marketing costs will apply in many instances, the Council considers the SPD is flexibly worded to reflect that this may not be the case in every instance.</p>

	<p>and the Isle of Dogs at present with a significant amount of units being sold. For multi-phased schemes, such as The Goodsyard that require constant marketing over a period of time and also the refurbishment of marketing suites that could, for some large schemes, be 3 or 4 years old this all results in significantly higher marketing costs which are generally above the market average for large multi phased schemes.</p>	
<p>77</p>	<p>Developer's profit - As discussed in the section above 'Overview' the level of profit allowed should not be adjusted so that the scheme becomes viable when providing the proposed level of planning obligations. Profit is related to a range of variables including mix, scale and geographical location and is derived from the market and the prevailing conditions. Profit cannot arbitrarily be fixed at a certain level simply to manufacture a particular outcome.</p> <p>The Council states that it expects that profit on residential development, including affordable housing, to be expressed as a percentage of Gross Development Value (GDV). The Ballymore Group/ BGY Regeneration Limited believe that the profit measure should be looked at on a site by site basis as clearly for a long-term, multiple phased scheme, an IRR profit measure is the more appropriate measure to use than a percentage of GDV.</p>	<p>Noted. The requirement in paragraph 5.6 of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit.</p> <p>The SPD makes an allowance for the use of Internal Rate of Return as an appropriate measure of profit for certain schemes.</p>
<p>78</p>	<p>Benchmark land value - This section emphasises the comments made in the original submitted representations, The Ballymore Group/BGY Regeneration Limited supports that the SPD recognises that there are a number of ways of establishing an appropriate benchmark land value (BLV) that are aligned with the NPPF, NPPG and Best Practice Guidance. It is for each landowner and practitioner to work through the various tests and often an explanation in accordance with policy and guidance as to the appropriate BLV.</p> <p>The one size fits all approach to land values does not reflect the unique nature of development sites and the SPD seems to acknowledge this by recognising a number of ways of establishing an appropriate BLV. The</p>	<p>Noted.</p> <p>The Council acknowledges the issue highlighted in establishing an appropriate level of premium. In the Council's experience a premium of 20% is most commonly applied hence the SPDs reference to this level of premium generally.</p> <p>Although this may be the case, we will consider the premium on a site by site basis at the Councils discretion.</p>

	<p>SPD recognises that the CUV+ to viability is the preferred approach. However, it is the 'plus' in the equation that is relevant and should reflect the particular characteristics of the site and therefore a premium above 20% could be exceeded depending upon the characteristics of the site.</p> <p>As an example, a site with an existing tenanted office building with good rents may yield a reasonable CUV and with limited scope for a greater amount of space on the site, the uplift from CUV required to release the site may be very limited. Conversely, a cleared site or one with low-density and low-grade industrial uses, with an allocation for mixed use development, perhaps increasing site coverage multiple times, will not likely be released with a premium above CUV of 20% to 30% and it is highly probable that the release value will be a multiple of CUV rather than a margin above.</p>	
79	<p>Timings - The SPD recognises that review mechanisms can contribute to additional planning gain based on future market improvements. Reviews have been incorporated on longer-term schemes, the RICS suggest a five-year development programme might be appropriate or where there are multiple phases. The SPD should seek to avoid the use of reviews on shorter term projects, unless exceptional circumstances exist, as reviews on smaller projects decrease the prospects of funding opportunities and ultimately, deliverability. The time taken to negotiate reviews, particularly on smaller schemes, can also be disproportionate.</p> <p>Reviews can also be time consuming in terms of their collation and their execution. In a single-phase scheme with a development programme of say two to three years, the potential for significant upside is relatively limited.</p> <p>The period of 24 months for the pre-implementation review should not be fixed and should be considered on a site by site basis. Clearly for large strategic sites such as Bishopsgate Goodsyrd a longer period is required to reach substantial implementation than for a smaller, less complex site. This should form part of the S106 negotiations.</p>	<p>The approach of the SPD in this regard is consistent with the Mayor of London's Affordable Housing and Viability SPG.</p> <p>To address the issue of certain schemes finding it more challenging to reach substantial implementation, the SPD has been amended to provide greater clarity in terms of 'substantial implementation' being a matter that can be agreed between the Council, the applicant and where appropriate the Greater London Authority.</p>

<p>80</p>	<p>Viability review process - The SPD doesn't recognise that the site value forms part of the viability review and clearly should a review take place 2 or 3 years from the date of the signing of the S106 there needs to be an up to date assessment of the site value to make sure that it is still providing a competitive return to the landowner so that the site would still come forward. Therefore, this is not consistent with the NPPF's reference to a reasonable return to a landowner.</p> <p>A site value at to today's date which incentivises the landowner to release the site for development could be significantly different in 5 years' time, at which point may underestimate the site value and therefore not be consistent with the NPPF as stated above by not providing a reasonable return to a landowner.</p>	<p>The Council does not agree that it is appropriate to account for site value in review mechanisms.</p> <p>The Council's approach to viability reviews is consistent with the Mayor of London's Affordable Housing and Viability SPG.</p>
<p>81</p>	<p>The Ballymore Group/BGY Regeneration Limited accepts the principle of a pre-implementation review, however, would like further clarity on the statement <i>"Where a development has reached 'substantial implementation' within 24 months of the grant of planning permission and market conditions and the viability of a scheme remains relatively unchanged, a pre-implementation review would not normally be required"</i>. The Ballymore Group believe that if 'substantial implementation' is reached within 24 months of the grant of planning permission then a review would not be required. It should not be subject to the council's views over market conditions and the viability of the scheme.</p> <p>The definition of 'substantial implementation' should be defined on a site by site basis. Clearly, for smaller sites 'substantial implementation' based upon the definition provided in the SPD could be reached within 24 months of the grant of planning permission but for the larger regeneration sites this would become significantly harder to achieve.</p> <p>The Ballymore Group does not agree with the reference to a further review if development stalls for a further period of 12 months after 'substantial implication'. Factors outside of the applicant's controls could result in the developer stalling and clearly the implications of a further review would further stall the development.</p>	<p>Noted, the SPD has been amended:</p> <ul style="list-style-type: none"> • To remove the reference to changes in market conditions impacting the extent to whether a pre-implementation review is carried out; • To provide greater clarity in terms of 'substantial implementation' being a matter that can be agreed between the Council, the applicant and where appropriate the Greater London Authority. <p>The Council does consider reviews can be applied as a result of stalled development although the Council highlight that this matter can be considered on a case-by-case basis.</p>

82	Advanced stage reviews - The Ballymore Group would highlight the implications of imposing a viability review once the sale of 75% of residential units have been achieved. The main risk is in regards to securing funding due to the risk that an advanced stage review would cause to the developer. Banks would be reluctant to provide funding if there is a risk that an unforeseen payment could be made at the end of the project and therefore it is likely that the bank would provide funding on the worst case i.e. the affordable housing contribution cap is payable. This is likely to result in more onerous conditions on the developer.	The approach of the SPD in this regard is consistent with the Mayor of London's Affordable Housing and Viability SPG. The Council may consider alternative approaches that are supported by evidence on a case-by-case basis.
83	Payments in Lieu and Off-Site Delivery - The formula is incorrect as it does not consider the cost to the developer of delivering a private unit i.e. profit.	The Council does not agree that this is the case. Profit will be factored into viability negotiations that take place up to the point when the calculation for a payment in lieu takes place.
84	Formula 1 - The Ballymore Group would question why any surplus determined as a result of the viability review is split 60/40 in favour of the Council. The developer takes all of the risk in delivering the project whilst any surplus as an outcome of the developer striving to improve the schemes performance of the scheme is weighted in favour of the Council. If anything, the split should be on an equal 50/50 split if not in favour of the developer.	The SPDs approach to Review Mechanisms has been formed to be consistent with the Mayor of London's Affordable Housing and Viability SPG.
85	Formula 2 - The formula should be calculated on the scheme specific details such as affordable rent floorspace and intermediate floorspace, if known. Affordable rent and intermediate values should be based upon the scheme specifics rather than London average.	The SPDs approach to Review Mechanisms has been formed to be consistent with the Mayor of London's Affordable Housing and Viability SPG.
86	DVSPD10 - Gerald Eve on behalf of Crest Nicholson London	
87	GE notes that aggregation of costs and values can be a helpful way of illustrating viability in summary form. Regarding KR10 GE considers that raising confidentiality concerns should not only be possible at pre-application stage but later too as otherwise this will prevent reasonable application of the law on disclosure. The following amendment to KR10 is therefore proposed:	The Council notes the proposed amendments to the wording but considers that the current wording in the SPD carries the same meaning as the proposal so there is no need to amend this point.

	<p><i>“The Council may allow for exceptions to this in limited circumstances and only in the event that there is a convincing case that disclosure of an element of a viability assessment would cause harm to the public interest to an extent that is not outweighed by the benefits of disclosure. If an applicant considers that a circumstance such that information should be maintained as confidential is likely to arise, this should be raised at an early a stage as possible and preferably, where possible, during the pre-application process”</i></p>	
88	<p>LBTH should note the original comments that an over-reliance on EUV+ as the default methodology is likely to prevent a significant number of sites from being delivered, particularly those with low EUVs. GE notes that at para. 2.10 of the SPD, NPPG is quoted as saying “there are a range of acceptable approaches to assess the value of land...”. The SPD’s prescription that EUV+ should be used is therefore contrary to the NPPG. An explanation should be provided as to how and why EUV+ is consistent with emerging and adopted guidance from the Mayor of London as well as the NPPF and NPPG. Without an explanation this is not robust and not consistent with para. 023 of the NPPG.</p>	<p>The Council does not consider that the SPD as drafted is contrary to the NPPG nor is it absolutely prescriptive in terms of an EUV+ approach. The Council considers the EUV+ approach is generally the most appropriate approach as this is consistent with guidance produced by the Mayor of London. This approach has also been found to be acceptable in appeal decisions.</p>
89	<p>GE notes that the approach is in line with the Mayor’s SPG. GE also notes that the Mayor’s SPG approach to reviews has received significant objections. Our first stage comments still remain. LBTH should note that overly punitive review mechanisms can act as a disincentive to develop in certain circumstances, can act as a barrier to bank lending and can prevent sites from coming forwards for development.</p>	<p>Concerns are noted. The Council considers it very important to be able to appropriately capture future uplift in values to help deliver much needed affordable housing.</p>
90	<p>The SPD should use the example of commercial rents being considered as being deemed commercially sensitive information by the ICO. GE considers that para. 5.3 of the SPD appears to be prejudicing the balancing exercise undertaken as per of the disclosure assessment. Reference to the relevant regulations is appropriate as this ensures LBTH can exercise its discretion as it deems appropriate as a public authority that must adhere to the law as set out in the EIR 2004. Reference to</p>	<p>The Council has sought substantial advice on the matter of disclosure and transparency and, in the context of this, the need to encourage community involvement and the agenda of transparency of the current administration, it is confident the approach set out in the SPD is appropriate.</p> <p>Paragraph 5.4 of the SPD references the Environmental Information Regulations 2004 (EIR) so the Council does not see the need to update</p>

	<p>LBTH having regard to the ICO and Information Tribunal we consider to be appropriate as it does not require LBTH to follow the decisions slavishly but have regard to them in determining application of the EIR Regs 12(4) and (5). It would be a useful reference to those reading and applying the SPD (both officers, members of the public and applicants). Para. 5.3 of the SPD should therefore be revised as follows:</p> <p><i>The Council may allow for exceptions to this in limited circumstances in accordance with Regulation 12(4) and 12(5) of the Environmental Information Regulations 2004 (as may be amended from time to time) in the event that there is a convincing case that disclosure of an element of a FVA would cause harm to the public interest to an extent that is not outweighed by the benefits of disclosure. The Council in making decisions relating to disclosure will have regards to the Information Commissioner’s Office guidance and decisions taken by the Information Commissioner’s Office and the Information Tribunal. In addition, the Council may allow the submission of a FVA that aggregates potentially commercially sensitive inputs.</i></p>	<p>this paragraph.</p>
91	<p>GE has concerns with the term ‘exceptional circumstances’ stated at para. 5.4 and notes that the law does not say it is in exceptional circumstances that public interest would apply. This adds an unnecessary term to the SPD, which can lead people to misunderstand the public interest test referenced in para. 5.3. ‘Limited circumstance’ is how the SPD describes this in para. 5.3 and also KR10.</p> <p>Para. 5.4 of the SPD should therefore be revised as follows:</p> <p><i>If an applicant wishes to make a case for an circumstance in relation to an element of their assessment such that information should be maintained as confidential, they should provide a full justification to the extent to which disclosure of a specific piece of information would cause an “adverse effect” and harm to the “public interest” that is not outweighed by the benefits of disclosure. The Council will consider this carefully, with reference to the “adverse effect” and overriding “public interest” tests in the Environmental Information Regulations 2004 (EIR), as well as the</i></p>	<p>Noted. The Council has amended the paragraph to remove the reference to the term ‘exceptional circumstance’.</p>

	<i>specific circumstance of the case.</i>	
92	<p>KR21 (N.B. this is now KR20 in the latest SPD version). An explanation should be provided as to how this key requirement is consistent with the approach described in the Mayor's Housing SPG and the Mayor's Affordable Housing and Viability SPD. Without an explanation this is not robust and not consistent with the NPPG (paras 023 and 024).</p>	<p>The SPD has been amended to better reflect the Mayor of London's Affordable Housing and Viability SPG in this regard.</p>
93	<p>GE notes that PPG para. 023 is now being quoted properly and in full at para. 2.10 of the SPD. GE considers that it may be of help to practitioners to remind them of the relevance of this paragraph within the 'Benchmark Land Value' section of the SPD.</p>	<p>Noted although the Council does not consider it necessary to quote para 23 of the PPG within the 'Benchmark Land Value' section of the SPD.</p>
94	<p>GE considers that by stipulating a preference for EUV+, LBTH is being overly prescriptive and therefore not in accordance with the NPPG. NPPG contains flexibility within it, which is vital in order to enable different types of sites to be assessed in different ways, thereby enabling delivery. GE has already set out the valuation-based flaws of EUV+ in principle, which LBTH should note. Should LBTH insist on defaulting to EUV+ as the preferred approach to Site Value then this is likely to hinder the delivery complex sites, in particular those with low EUVs.</p>	<p>The Council does not consider that the SPD is absolutely prescriptive in terms of an EUV+ approach. The Council considers the EUV+ approach is generally the most appropriate approach as this is consistent with guidance produced by the Mayor of London. This approach has also been found to be acceptable in appeal decisions.</p>
95	<p>LBTH should note that the RICS Guidance Note was written so as to be strictly in accordance with PPG. Whilst statutorily it does not form part of the Development Plan, it provides best practice guidance endorsed by the RICS and development industry.</p> <p>An explanation should be provided as to specifically how EUV+ is consistent with national guidance and the NPPF. How does the approach allow for competitive returns as set out in the NPPF?</p> <p>How does LBTH envisage calculating the 'plus' element other than stating that generally it will not exceed 20%? This as drafted is wholly prescriptive. How does this approach have regard to market-based evidence as required by PPG para. 023?</p>	<p>The Council have considered all guidance available and have found the EUV+ approach generally best reflects policy. National guidance (paragraph 24 of the Viability and Decision-Taking Planning practice Guidance) specifically refers to a current use value basis being an appropriate option for providing a competitive return for a land owner. It will be for applicants to justify the approach they take to the 'premium' – this can have reference to the condition and occupation status of the site in question. It can also take account of premiums applied in respect of comparable schemes.</p> <p>The SPD does not preclude the account of market-based evidence, but states a clear preference based on the fact that market evidence often imports factors that are not compatible with the required approach to forming Financial Viability Assessments and inappropriately diminishes the requirement for land value to be informed by policy.</p>
96	<p>GE considers that the arbitrary nature of the approach and its</p>	<p>The Council disagree with this view and have answered queries in this</p>

	shortcomings means that EUV+ in principle is not in accordance with PPG.	regard.
97	GE notes the revision to the SPD to the effect that planning permission is not needed for an AUV basis of valuation.	Noted.
98	GE agrees that in order for an AUV to be acceptable in valuation terms it must be in accordance with planning policy. GE does not agree that an AUV scheme, if designed, should be worked up to the equivalent level of detail as a proposed housing-led scheme. Such a requirement would lead to a doubling-up of design work, lengthening of project timescales and commensurate increase in professional fees and holding costs. Such factors are likely to have a negative impact on the viability and planning process and impede rather than encourage delivery.	Noted. The SPD has been amended to clarify the Council's approach.
99	<p>GE agrees that in order for an AUV to be valid, there must be a reasonable active prospect of market demand for such a use. AUV as a basis of valuation is simple and has its basis in the principles of substitution and optionality. The final bullet point suggested by LBTH is therefore not quite correct. It should therefore be amended to read as follows:</p> <ul style="list-style-type: none"> • In the real world the landowner <i>could</i> really develop out the alternative rather than use it as a negotiating lever to force down AH. 	Noted. Amendment made.
100	<p>This is noted. GE maintains that pragmatism will be required in the usage and drafting of review mechanisms, on a case by case basis, so as to not stymie development on complex urban sites.</p> <p>GE maintains that where it has been agreed that a review is necessary such a review should only be undertaken prior to implementation of the scheme or particular phase. Mid-term or advanced stage reviews can often introduce an unacceptable level of risk to a project and can act as a disincentive to development.</p>	Concerns are noted. The Council considers it very important to be able to appropriately capture future uplift in values to help deliver much needed affordable housing.
101	GE welcomes that LBTH will monitor the approaches to Build	Noted.

	to Rent development.	
102	DVSPD11 - Carter Jonas LLP on behalf of National Grid Property Holdings	
103	<p>Transparency - We previously highlighted that the transparency approach is inflexible with the exceptions to this only allowed “in very limited circumstances”. The Council has noted that public availability of information is key to ensuring the confidence in the planning system and that the process is open to scrutiny and that the SPD describes that in ‘very limited circumstances’ information may not be disclosed to the public. The Council considers that this is sufficient and that no changes are required in this regard. However, whilst acknowledging that transparency is important (as stated in our previous submission), there is still further scope for additional flexibility, as the phrase ‘very limited circumstances’ is overly prescriptive and unnecessarily inflexible. Given that a number of these assessments will include commercially sensitive information which could include items such as rights of light information, vacant possession compensation costs or allowance for acquisition of third party land etc. that could genuinely compromise an applicant’s commercial position, it is very important that these commercially sensitive elements are retained as confidential information and that this is reflected in the context of the guidance in paragraph 5.3. It is for the applicant to provide reasoned justification behind why certain information should be redacted, and on this basis, the wording as currently drafted is considered as too inflexible and should be amended.</p>	<p>The Council’s transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. The Council firmly considers that changes to the proposed SPD are not required in this regard.</p>
104	<p>Developer’s Profit - Paragraphs 6.25 and 6.26 suggest that where schemes are unviable at the proposed level of profit allowed for, the level of profit should be adjusted to the extent that the scheme as proposed becomes viable. It is noted that the Council has amended the wording in paragraph 5.6 to express any deficit against a benchmark land value in terms of an impact against the scheme’s profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit. However, this still seems to contradict the planning policy context elements referred to in Section 2 of the report, which reaffirms the NPPF’s commitment to ensure there are competitive returns for a willing landowner or a developer to enable a development to be deliverable. If profit levels are being driven down, this drives up risk and in the current</p>	<p>Noted. The Council does not consider changes are required in this regard and would highlight that the SPD alternatively allows for the inclusion of growth projections to account for any deficit.</p>

	<p>context where there is a degree of uncertainty in the financial markets (with Brexit etc.) this will raise the risk profile for banks and prospective lenders who would otherwise support a scheme. If the funding is limited and lenders see too much risk in this process, there is a real danger that development will not come forward. Therefore, if this point is progressed the end result could inadvertently be less housing and affordable housing coming forward as a result of certain schemes being seen as too 'risky' from an investment perspective. Therefore, NGPH retains its objection to this element of the FVA methodology and would ask that the wording is reconsidered.</p>	
105	<p>Pre-Implementation Reviews - Paragraph 7.10 confirms the circumstances around when a pre-implementation review would be required. Paragraph 7.11 is supported as it provides details behind what constitutes 'substantial implementation' to ensure that the requirement for pre-implementations reviews is totally clear.</p> <p>There are occasions when circumstances beyond a developer or applicant's control, can slow down the commencement of development. The discharge of pre-commencement conditions can sometimes cause a 'block' to the commencement of development on sites and therefore, there does need to be some sort of assurance from the LB of Tower Hamlets, that it will use best endeavours to ensure that a developer can start promptly on-site through assurances that the Council will progress this paperwork in a timely fashion.</p> <p>Ultimately any delays with pre-commencement conditions could prevent developers from meeting the pre-implementation review threshold. The Council has confirmed that it always uses best endeavours to respond to paperwork in a timely fashion and that it is not considered appropriate to reflect these changes within the SPD. Nevertheless, NGPH still consider that some further flexibility should be incorporated here to ensure that the requirements of the SPG are deliverable.</p>	<p>To address the issue of certain schemes finding it more challenging to reach substantial implementation, the SPD has been amended to provide greater clarity in terms of 'substantial implementation' being a matter that can be agreed between the Council, the applicant and where appropriate the Greater London Authority.</p>
106	<p>Advance Stage Reviews - It is noted that any surplus generated by a review at 75% sale of market residential units will be capped according to the level of contribution required by policy and associated guidance. However, the intention is to re-provide 60% of the surplus profit to be attributed to the delivery of additional affordable housing. Given that there</p>	<p>The Council's proposed approach in this regard is consistent with the Mayor of London's Affordable Housing and Viability SPG.</p>

	<p>is considerable risk inherent in development, NGPH would suggest that any surplus should be shared 60/40 in favour of the applicant, rather than the other way around.</p> <p>The Council has responded to this point confirming that the split is in line with that described with the Mayor of London's draft Affordable Housing and Viability SPG. However, at present the Mayor's document is only in draft and we do not know what the final outcome of this position will be and therefore, it would be premature to assert that this is the final agreed figure in the Mayor's final adopted version of the SPG which has not yet been produced. Therefore, it is not aligned with the NPPF or current adopted regional policy. NGPH also made representations to the Mayor's draft SPG to the same effect and therefore, given the risks associated with development, it is still considered that this amendment should be made.</p>	
107	DVSPD12 – DP9 on behalf of Landonewcastle	
108	<p>Pre-Application Advice - The document encourages the submission of a draft financial viability assessment (FVA) as part of the pre-application process with London Borough of Tower Hamlets (LBTH) where a proposal is likely to trigger a requirement to provide affordable housing or where any subsequent application is likely to rely on a FVA to justify a departure from headline planning policy requirements.</p> <p>Although our client supports early engagement with the Council, they do not believe that this is the appropriate forum to prepare a draft viability assessment as details, such as costs and values, of the scheme are unknown and evolve up until the point of the planning submission. Instead, our client would like the document to reflect a discussion on viability at the pre-application stage, but not a requirement to prepare a draft viability assessment.</p>	<p>The SPD aims to encourage early submission of viability information to lessen the likelihood of viability discussions causing delays in decision-making. It does not require the submission of viability information at the pre-application stage.</p> <p>The SPD acknowledges that the levels of detail that can be provided will vary from scheme to scheme. The Council does not consider any change to the document is necessary in this regard.</p>
109	<p>The document notes that applicants are required to meet the cost of the Council reviewing financial viability assessments and provide an undertaking to do so in order to for the planning application to be</p>	<p>Noted. All appointments of viability consultants by the Council are subject to a competitive process – the SPD will be amended to clarify this.</p>

	validated. The document should acknowledge that this is subject to competitive tendering to ensure good value for money for the applicant.	
110	The document notes that FVAs should be accompanied by an Executive Summary which outlines the key conclusions being drawing from the appraisal. Our client understands the need to provide a summary of the assessment so that the key points are presented. However, filling in a summary sheet appears to be an onerous requirement that is unnecessary given that this information is provided by the Argus appraisal summary. Therefore, the document should acknowledge and accept the submission of Argus (or similar) appraisal summaries.	The submission of the Appraisal Input Summary Sheet will remain a mandatory requirement. It is important that information is provided in this way in order to ensure a consistent approach to the collation and reporting of information to the public.
111	Transparency, Deliverability and Information Requirements - The shift towards full transparency is questioned by our client. The requirement of all information to be published creates a significant risk to a developer's commercial interests which is contrary to the tests as set out in the 2014 Environmental Regulations.	<p>The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. The Council firmly considers that changes to the proposed SPD are not required in this regard.</p>
112	The document states that FVAs cannot demonstrate that schemes are technically unviable and that the applicant should demonstrate how their proposed scheme is deliverable. The document goes on to note that where schemes are identified as unviable at the proposed level of planning obligations, the level of profit allowed for should be adjusted so that any deficit is expressed in terms of the impact on the scheme's profit. This will better inform the Council of the position of applicants where schemes demonstrate a deficit. Our client would be unwilling and unable to reduce their profit expectations at the expense of delivering planning obligations nor should they be asked to in accordance with the NPPF which explicitly states a competitive return to a willing developer should be provided to enable the	<p>The requirement of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit. This requirement is not intending to replace the need for the adjustment of planning obligations as described by the NPPF.</p> <p>The SPD does emphasise that growth projections can be included in an FVA to account for any deficit.</p>

	development to be deliverable. By reducing the profit expectations to satisfy LBTH that the development is deliverable simply increases the risk of the development not coming forward in the foreseeable future.	
113	<p>Methodology: Financial Viability Assessments - Whilst it is accepted that some abnormal costs are likely to result in a lower land value than could be achieved on a site, the document does not recognise that not all abnormal costs are known by the applicant until the land has been purchased and detailed site investigations have been carried out.</p> <p>Furthermore, the land value, as stated in the NPPF, should still provide a competitive return to the landowner in order to bring forward the site for development and this should be taken into consideration when considering abnormal costs and site value together. Where abnormal costs take the land value below the landowner's reasonable expectation, it may only be flexibility that is permissible in planning gain contributions, that ultimately allows the site to be delivered.</p>	The Council considers the wording of the SPD to be appropriate in respect of the impact of abnormal costs on land value.
114	<p>The document notes that the benchmark land value (BLV) should always reflect policy requirements, planning obligations and CIL charges. This is not supported by our client as a BLV based on an existing use on site cannot reflect planning requirements. For example, if a landowner has an existing office, he cannot be expected to reduce the value of the office building to account for planning policy requirements on a development. Although our client agrees that benchmarks based on alternative use values should reflect planning requirements, existing use values cannot be adjusted to absorb planning policies and requirements.</p> <p>The document notes that in most cases BLVs will be assessed with reference to existing use values (EUV) of the site, plus a financial incentive that would ensure the release of the land from its existing use. It goes on to note that the premium above the EUV will generally not be expected to exceed 20%. The document should recognise that the NPPG, in referencing the NPPF 'willing return' requirement at s.173, references the use of market evidence. Whilst EUV might be appropriate in some instances, the margin should be assessed by reference to</p>	<p>The Council considers the EUV+ approach is generally the most appropriate approach as this is consistent with guidance produced by the Mayor of London. This approach has also been found to be acceptable in appeal decisions.</p> <p>In the Council's experience a premium of 20% is most commonly applied hence the SPDs reference to this level of premium generally. The SPD does not describe that a maximum premium of 20% applies.</p>

	evidence in certain circumstances. The document is currently too focused on EUV only and the premium referred to could be deemed to be arbitrary.	
115	It is noted within the document that in some instances an alternative scheme may be used to form a BLV. Although this is accepted, the document should acknowledge that the applicant will incur considerable additional costs to work up an alternative scheme in the equivalent level of detail required. This should be proportionate with the test of agreeing that the alternative use value scheme would be acceptable in principle. It should also be acknowledged that a developer who has purchased a site may have different drivers than a landowner who is simply holding land as an investment.	The SPD has been updated to clarify the information required to justify the use of an AUV.
116	Viability Reviews - The document states that review mechanisms will be used to obtain additional planning gain based on future market improvements. The document should seek to avoid the use of reviews on shorter term projects, unless exceptional circumstances exist, as reviews on smaller projects decrease the prospects of funding opportunities and ultimately, deliverability. Moreover, there should be some flexibility on the application of reviews. For example, if a developer offers a certain level of affordable housing that is currently unviable which is dependent on growth in values, then they are in effect anticipating the growth that a review mechanism would identify.	<p>The SPDs approach to Viability Reviews is consistent with the Mayor of London's Affordable Housing and Viability SPG. The Council will work with applicants/developers in respect of review mechanisms drafted in specific S106 agreements but consider it important to set out a framework in the SPD for the basis of the formation of these parts of the agreements.</p> <p>A recent appeal decision (APP/V5570/W/16/3151698) found that it is acceptable to apply to single phased, shorter term projects.</p>
117	The document doesn't recognise that the site value forms part of the viability review and clearly should a review take place a number of years from the date of signing the Section 106 agreement there will need to be an up to date assessment of the site value to make sure that it is still providing a competitive return to the landowner. This is not consistent with the NPPF's reference to a reasonable return to a landowner.	<p>The Council does not agree that it is appropriate to account for site value in review mechanisms.</p> <p>The Council's approach to viability reviews is consistent with the Mayor of London's Affordable Housing and Viability SPG</p>
118	The period of 24 months for the pre-implementation review should not be fixed and should be considered on a site by site basis. Clearly for larger sites a longer period is required to reach substantial implementation than	To address the issue of certain schemes finding it more challenging to reach substantial implementation, the SPD has been amended to provide greater clarity in terms of 'substantial implementation' being a matter that

	<p>for a smaller, less complex site. This should form part of the Section 106 negotiations.</p> <p>Any contributions required as a result of review mechanisms should be capped at a level which is equivalent to the Council's policy requirement. Payments should not be open-ended and a payment cap established at the point planning permission is granted.</p>	<p>can be agreed between the Council, the applicant and where appropriate the Greater London Authority.</p>
119	<p>The document notes that where a viability review demonstrates an improvement in a scheme's viability, 60% of the surplus must be paid to the Council or put towards the provision of additional affordable housing units. This is not supported by our client as review mechanisms should allow developers to achieve a normal level of profit before additional contributions are triggered. Failure to do so could result in schemes becoming difficult to fund or deliver. Surpluses should only arise after the development concerned has generated a full developer's profit at agreed target levels.</p>	<p>The review mechanism formula in the SPD allows for a normal of level of profit for a developer.</p>
120	<p>Affordable Housing Payments - Our client supports the inclusion of payment in lieu of affordable housing; however, further clarity is required when such a payment would be acceptable and whether this will need to be evidenced by way of a FVA.</p>	<p>The acceptability of a payment in lieu for affordable housing and the evidence required to justify such a payment, falls under the remit of the Council's existing (and proposed) Local Plan, not the SPD.</p>
121	DVSPD13 – Natural England (no substantive comments made)	
122	DVSPD14 – Aberfeldy New Village on behalf of Prime Place and Poplar HARCA	
123	<p>Threshold Approach to Viability - Firstly, while the SPD notes that developers bringing forward schemes that are policy compliant and without subsidy will not be required to submit a viability appraisal, the Draft SPD qualifies this by making the point that developers will still be expected to justify their position on assumed benchmark land value and local tenure mix policies. Our concern is that this could result in the Council expecting a certain amount of appraisal work, and justification, simply to confirm that a viability appraisal is not necessary. This, in itself, will introduce uncertainty, expense and delay into the pre-application process.</p>	<p>The SPD has been updated to reflect the Council's latest position in respect of the Threshold Approach to Viability and accords to guidance published by the Mayor of London.</p>

124	<p>Developer's Profit - Paragraph 6.26 notes that where schemes are unviable, then the level of profit allowed for should be adjusted. The point should be made that it is accepted by LBTH that many developments do not have the flexibility to adjust their profit levels as they must achieve a certain profitability set by joint venture agreements and/or bank lending agreements. In such cases, if profit levels are required to be reduced, delivery of the scheme would stall.</p>	<p>The requirement of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit. This requirement is not intending to replace the need for the adjustment of planning obligations as described by the NPPF.</p> <p>The SPD does emphasise that growth projections can be included in an FVA to account for any deficit.</p>
125	<p><i>Existing Use Value Plus (EUV Plus)</i> - Existing Use Value Plus is not an appropriate means for assessing land value. By prescribing EUV Plus the Council is advocating an approach that will result in a number of difficulties. Adopting EUV Plus as the benchmark may conflict with:</p> <ul style="list-style-type: none"> a) the expectations of landowners who on the basis of similar transactions may expect an alternative use value or market value; b) land deals already agreed on the basis of market value; c) the assumptions that underpin existing local plan viability assessments; and, d) the assumptions that have informed current negotiations or underpin existing decisions. <p>This approach is also at odds with that set out in the NPPF and reinforced by PPG. Paragraph 173 of the NPPF states:</p> <p><i>"To ensure viability, the costs of any requirements likely to be applied to the development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable"</i></p> <p>PPG (10-023-20140306) states <i>'the most appropriate way to assess land or site value will vary from case to case'</i>. It also conflicts with para 4.1.4/5/6 of the recently adopted London Plan Housing SPG (2016) page</p>	<p>The Council does not consider that the SPD as drafted is contrary to the NPPF or NPPG nor is it absolutely prescriptive in terms of an EUV+ approach. The Council considers the EUV+ approach is generally the most appropriate approach as this is consistent with guidance produced by the Mayor of London. This approach has also been found to be acceptable in appeal decisions.</p>

	<p>11 of the GLA's Development Appraisal Toolkit Guidance Notes (Jan 2014), pp.28-29 of the LHDG's Viability Testing Local Plans (June 2012) and p12 of the RICS Financial Viability in Planning Guidance Note (2012) – all of which advocate several approaches to land value. None solely rely on Existing Use Value (EUV).</p> <p>Whilst it is recognised that it is the Council's intention for land values to adjust to enable affordable housing delivery, the EUV Plus approach fails to recognise the existence of competing commercial land uses.</p>	
<p>126</p>	<p>Viability Reviews - The necessity of viability reviews, if any, must be considered on a scheme by scheme basis in order to determine whether such a mechanism is appropriate having regard to the NPPF, PPG and London Plan. There will be many cases where schemes are not of a sufficient size or construction duration to necessitate a viability review and, if applied could have a detrimental effect on their delivery.</p> <p>Larger schemes may have been appraised using growth models in order to determine the maximum reasonable level of affordable housing and other planning obligations where again it would be inappropriate to require the addition of a review mechanism, assuming the scheme proceeds in a timely manner having regard to the particular circumstances.</p> <p>Reviews should only be undertaken prior to implementation of the scheme or particular phase in order to be in accordance with the PPG, London Plan and RICS GN.</p>	<p>The Council will work with applicants/developers in respect of review mechanisms drafted in specific S106 agreements but consider it important to set out a framework in the SPD for the basis of the formation of these parts of the agreements.</p> <p>The Council firmly considers that the application of review mechanisms generally is appropriate and consistent with the Development Plan and associated guidance.</p>
<p>127</p>	<p>The Planning Inspectorate has been clear in appeal cases that where a scheme is single phased a post-implementation review is inappropriate and not in accordance with the NPPF or the PPG, including where such a review is prescribed in a Council's SPD or SPG.</p> <p>Two appeal decisions are particularly relevant. In the Langley Road Appeal Decision (ref. APP/Q1255/S/15/3005876, paras 11 to 15), the</p>	<p>The Council disagrees with the assertion that the Planning Inspectorate "has been clear in appeal cases that where a scheme is single phased a post-implementation review is inappropriate".</p> <p>The Council would note that the Langley Road appeal was outside London and not subject to the same regional plan as London.</p>

<p>Inspector concluded an overage clause (i.e. post implementation review mechanism) would unreasonably affect the viability of the scheme. In accordance with the Appeal Scheme, the Langley Road scheme was to be constructed in a single phase. The Inspector concluded that whilst the Borough of Poole's Affordable Housing Supplementary Planning Document (the SPD) says an overage clause can be imposed, this is contrary to DCLG Guidance (Section 106 Affordable Housing Requirements: Review and Appeal):</p> <p><i>"Paragraph 10 in the Guidance repeatedly emphasises the need for viability evidence to be based on current costs and market values. However, in contrast the overage clause suggested by the Council is introducing a further assessment of viability based on costs and sales returns at a future date. Therefore, in this regard the clause is contrary to the Guidance, and this was accepted by the Council at the Hearing. Moreover, I share the Appellant's view that the clause brings a significant element of uncertainty into the future value of the land and the returns it would provide....the uncertainty this would create means the clause could well discourage investors and make funding for the scheme harder or more expensive to secure."</i> (Paragraphs 11 and 12).</p> <p>The Inspector came to the same conclusion in the Wellington Road Appeal Decision (ref. APP/E5330/S/16/3143743, paras 22 to 28). The Inspector stated there is clear guidance that post-development appraisals are not considered appropriate as it increases uncertainty and risk:</p> <p><i>"Quite apart from the clear guidance which seeks to avoid post development reappraisals... I acknowledge that any such exercise here could result in a lower return than that agreed as appropriate. I accept that such an outcome would be a significant disincentive to development and would be likely to hinder the development process"</i> (paragraph 26).</p> <p>The Inspector resolved that it would not be reasonable for the Section 106 to include a review mechanism incorporating a post-development (i.e.</p>	<p>In addition, the Council would highlight the recent appeal decision referenced APP/V5570/W/16/3151698. This decision clearly accepted a pre-implementation review for a scheme that is likely to be single phased. It also accepted the concept of an advanced stage review and did not accept "that such a review mechanism should present any commercial difficulties in terms of lending or certainty as the mechanism would only require the provision of additional affordable housing (in the form of a financial contribution) where surplus profit became available above the target level agreed".</p>
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	<p>post-implementation) development appraisal.</p> <p>The NPPF sets out at para 204 that:</p> <p><i>“planning obligations should only be sought where they meet all of the following tests:</i></p> <ul style="list-style-type: none"> • <i>necessary to make the development acceptable in planning terms;</i> • <i>directly related to the development; and</i> • <i>fairly and reasonably related in scale and kind to the development.”</i> <p>Where a Section 106 Agreement has a post-implementation review mechanism, it is the norm for lenders/funders to look at the downside risk of a full payment having to be made. In other words, lenders usually ascribe to unknown factors, a worst-case position. This will, all other things being equal, affect finance and funding costs and impact negatively on viability and deliverability.</p> <p>If used incorrectly, or on a blanket basis across all types of development sites, there is likely to be a commensurate increase in development risk and uncertainty. This could lead to a reduction in sites coming forward for redevelopment and a climate where it is increasingly difficult to obtain bank finance. We would welcome the opportunity to discuss the banking implications of review mechanisms with Tower Hamlets in detail if Officers wish.</p>	
<p>128</p>	<p>We consider the Advanced Stage Review set out in the SPD at paragraph 7.20 – 7.22 fails to deal with the fact that the timing for delivery/occupation of the market housing will be dependent upon the market. We consider that a more appropriate trigger would be a period of time rather than a percentage of occupation.</p> <p>The viability review mechanism set out in the SPD is effectively a form of overage provision.</p> <p>As set out in the RICS GN this is:</p> <p><i>“... not appropriate as development risk at the time of implementation cannot be accounted in respect of the inevitable uncertainty of</i></p>	<p>The Council does not consider that applying a review mechanism based on a period of time would be a more appropriate option.</p>

	<i>undertaking a development or individual phase. It also undermines the basis of a competitive return as envisaged by the NPPF by introducing uncertainty post the implementation of the development. This may make funding the scheme difficult or unlikely in many cases.”</i>	
129	Notwithstanding our concerns regarding the principle of overage-style review mechanisms that can serve to increase development risk on sites should they be enforced, the proposed 40%/60% surplus split in favour of the Council is considered overly punitive for developers. Such a mechanism could act as a disincentive to develop in the Borough and is likely to comprise a barrier to obtaining finance.	The approach of the SPD to review mechanisms is consistent with the approach set out in the Mayor of London’s Affordable Housing and Viability SPG.
130	<p>A formulaic approach to pre-implementation reviews may only be appropriate in limited situations and so the type of review mechanism should be carefully considered on a case by case basis. Post-implementation reviews are in most cases inappropriate, as set out in the RICS GN. The point should be made that the overly frequent occurrence to producing these appraisals and checking them, both of which has to be paid for by the Applicant is particularly expensive. Also, there needs to be more consideration given to the planning process that will have to be followed should the levels of affordable units need to be adjusted on site, both up and down.</p> <p>Finally, an overarching principle of review mechanisms is that they should be fair and equitable for all parties without increasing development risk unduly (and therefore threatening delivery). As such, we question whether the approach to reviews set out in the SPD adheres to these principles and requests that this part of the SPD is given further consideration.</p>	The Council firmly considers that the application of review mechanisms generally is appropriate and consistent with the Development Plan and associated guidance.
131	Build to Rent Schemes (PRS) - The SPD provides a cursory mention of the build to rent sector (BtR). At paragraph 6.33, the Council is correct to note that the approach to assessing viability of BtR schemes may vary from ‘build for sales’. In this respect, reference to the Mayor’s Draft Affordable Housing Viability SPG (November 2016) is welcomed. The document aims to encourage institutional investment in the private rented sector thereby diversifying the housing market and acknowledges that	<p>Noted.</p> <p>The Council is conscious that the White Paper does not say anything substantive with regard to the approach to viability for Build to Rent development so does not see the value in making a reference to this document in this context.</p>

<p>Build to Rent developments can make a particular contribution to increasing housing supply, and can:</p> <ul style="list-style-type: none"> • Attract investment into London’s housing market that otherwise would not be there; • Accelerate delivery on individual sites as they are less prone to ‘absorption constraints’ on build-out rates; • More easily deliver across the housing market cycle as they are less impacted by house price downturns; • Provide a more consistent and at scale demand for off-site manufacture; • Offer longer term tenancies / more certainty over long term availability; • Ensure a commitment to, and investment in, place making through single ownership; <p>and,</p> <ul style="list-style-type: none"> • Provide better management standards and higher quality homes than much of the mainstream private rented sector. <p>In order to increase the number and quality of Build to Rent homes the Mayor’s SPG introduces the following measures:</p> <ul style="list-style-type: none"> • Definition – a clear definition of Build to Rent with guidance on how and when a covenant through planning should apply; • Affordable Housing tenure – recognition that all Build to Rent homes need to stay under single management and as such the Mayor will encourage affordable homes in such developments to be delivered as discounted market rent (preferably at London Living Rent levels), managed by the Build to Rent provider (or possibly via another designated manager); 	<p>The Council is monitoring both national and regional approaches to the treatment of Build to Rent development and will form its approach accordingly in due course.</p>
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<ul style="list-style-type: none"> • Design – how the flexibility set out in Policy 3.5d of the London Plan could be applied to Build to Rent; • Viability – the ‘threshold approach’ for affordable housing (as proposed by the SPG) would not be applied to Build to Rent developments. Instead viability information would be required and assessed under a specific Build to Rent viability approach, recognising the distinct economics of the sector; and • Management standards – Build to Rent developments should showcase the best management practice in the rented sector. <p>The Housing White Paper contains proposals to:</p> <ul style="list-style-type: none"> • Change the National Planning Policy Framework so authorities know they should plan proactively for Build to Rent where there is a need, and to make it easier for Build to Rent developers to offer affordable private rental homes instead of other types of affordable housing; • Ensure that family-friendly tenancies of three or more years are available for those tenants that want them on schemes that benefit from our changes. We are working with the British Property Federation and National Housing Federation to consolidate this approach across the sector; and • Introduce a definition of affordable private rented housing, which is a particularly suitable form of affordable housing for Build to Rent schemes. The Department for Communities and Local Government (DCLG) have just finished consulting on Planning and Affordable Housing for Build to Rent. • Proposes that a minimum of 20 per cent of the homes within the scheme would be offered at Affordable Private Rent, and (to the extent practicable) the homes offered at a discount should be broadly representative of the overall development, in terms of numbers of 	
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	<p>bedrooms.</p> <ul style="list-style-type: none"> • Consistent with the tenure-blind ethos of Affordable Private Rent, the specific homes within the development that would be provided at a discount could be flexed over time. Of the affordable units, the average discount to be offered across any development would be at least 20 per cent relative to local market rent levels (i.e. the comparator would not be the market rent homes within the scheme itself). • The discount would be calculated when a discounted home is rented out (or the tenancy renewed), and the rent on the discounted home would then increase at no more than inflation during the period of the tenancy. Where the level of discount is to be flexed across the scheme (e.g. some units discounted by more than 20 per cent, others at less, so as to preserve an average of 20 per cent), then this would be agreed with the local authority. 	
<p>132</p>	<p>Buy to Rent Viability - Future viability assessments on BtR developments, other than a pre-implementation review, are not appropriate or workable for BtR developments and should be specifically excluded. This is because BtR deals are usually forward funded by a future asset owner or are sold during the development period. Under both of these scenarios the asset owner/investor is looking for certainty of return and is taking market risk. They will be providing a fixed level of capital based on a long-term view of how the asset will perform. It is, therefore, not appropriate for a review to be undertaken after a short period of time and for any uplift to be shared as there may be issues affecting the performance of the asset over its lifetime on which the asset owner will have taken a view. In addition, the investor/asset holder will not have allocated additional capital to cover such an eventuality and the develop will have sold the asset and no longer have any involvement in the development.</p> <p>The distinct economics affecting Buy to Rent developments is clearly set out in Paragraph 4.5.1 of the Mayor's Housing SPG (March 2016), whereby boroughs are encouraged to take account of the distinct</p>	<p>The Council will be considering approaches to viability reviews on build to rent development as both national and regional approaches develop.</p>

	economics of private rent when assessing affordable housing contributions from covenanted private rented schemes.	
133	DVSPD15 – Transport for London	
134	From the TfL perspective my main concern is in respect of the approach to CIL and planning obligations. The wording of para 6.20, together with the glossary definitions for CIL and section 106 (s106), both indicate that s106 contributions should be non-infrastructure related. I would wish to reiterate the concerns expressed in that letter and that serious concerns remain that the approach outlined is a misinterpretation of the CIL regulations and is unworkable in respect to transport mitigation.	This point is noted, minor amendments have been made to the SPD.
135	DVSPD16 – London Borough of Islington	
136	Islington fully supports the approach taken in the draft SPD in regards to increased transparency of viability information in the planning process, and shares the view that greater accountability and public participation to enhance both public engagement and confidence in the planning system. In addition, Islington notes that the draft SPD takes into account the London Borough Viability Group Protocol and this is welcomed. In particular, the recognition that in most cases Existing Use Value Plus (EUV+) is the most appropriate approach in determining Benchmark Land Value, and that Market Value transactions and the price paid for land should only be used where it can be robustly demonstrated that they fully reflect Development Plan policies as required by PPG, is supported by Islington.	Noted.
137	DVSPD17 – Greater London Authority	
138	As noted in our previous response we welcome the borough's intention to adopt the threshold approach to viability in line with the Mayor's Draft Affordable Housing and Viability Supplementary Planning Guidance. Given that both the documents are at the draft stage it is recommended that the borough continues to work with the GLA to ensure consistency in approach.	Noted.
139	DVSPD18 – Alpha Grove Freeholders Association (AGFA)	

<p>140</p>	<p>AGFA welcomes Tower Hamlets Draft Development Viability guidance for its intention to provide the public with information necessary to scrutinise developers' Viability Assessments, which detail assumptions about costs and revenues when submitting planning applications. We support the aims, of maximising affordable housing provision, and enabling public debate about how revenues from developments are divided between different interests and public benefits.</p>	<p>Noted.</p>
<p>141</p>	<p>But we are very concerned that the draft policy as it stands does not require social landlords and their developer partners to publish similarly detailed information about all possible options for the 'regeneration' of social housing estates - at the crucial 'option appraisal' stage, ie, long before a decision is made on which option to submit a planning application for.</p> <p>Currently the policy also omits to calculate the "like for like" option when considering or has a possibility of a "Compulsory Purchase Order (CPO)" the viability option should consider and calculate like for like figures and incorporate that within the viability options. Surely the council does not want to see the home owners being worse off by any regeneration, acquire or demolition. The absence of a "Like for like" viability option will seem a cleansing of a certain group of home owners who cannot afford to remain within the same area</p> <p>Currently in such situations where home owners (i.e. Leaseholders, Share of Freehold and Freeholders) are to lose their homes and offered the governments bare minimum of buying them out; there is no credible option such home owners to remain in the area with a like for like option. As the council's ambition is to be much more inclusive of all and open; we believe this is the right time for this council adapt the proposed policy as outlined below. This will also give this council (LB Tower Hamlets) to be the first in pioneering this policy</p> <p>You would agree that, these are terrible omissions, because it means that residents facing life changing situations and the possible demolition of</p>	<p>The 'Options Appraisal' stage of Estate Regeneration is not formally part of the planning process so requiring the publication of financial information relating to this stage would be challenging for the Council to enforce.</p> <p>The Council does however want to make sure residents are as informed as possible in such situations. The Council has amended the SPD to encourage the provision of such information, where possible.</p>

<p>their homes are unlikely to be given the detailed information necessary to scrutinise and judge all possible options for the future of their estates, or to suggest changes or alternatives. As a result, landlords could dismiss options, (or policies such as fully delivering a 'right to return' or "like for like") as 'not viable,' without publishing the assumptions and financial details to support such a conclusion</p> <p>Therefore, we strongly urge the council to add the following policy to its Viability Guidance:</p> <p>"Any loss of homes by demolition by any developers, especially by Social landlords considering the redevelopment of estates where demolition of homes may be proposed will be required to publish full viability information at the option appraisal stage on all possible options inclusive of "like for Like" option for the future of estates.</p> <p>Published information should include all the assumptions and financial details that a social landlord inevitably has to prepare to evaluate option(s) itself, including: costs of planned maintenance and repairs, possible refurbishments and replacement for a like for like properties. In the event of redevelopments; costs of demolitions and compensation for tenants and owners; strategy for facilitating the right to return for tenants and like for like for owners, and the financial implications; sales values and rental yields of private units; affordable housing quantities and tenures, including housing costs for intermediate tenures and social/affordable rent levels; payments made by social landlords for affordable housing units; CIL & S106 contributions; developers' profits and social landlord surpluses; construction costs; professional fees; cost for like for like and all other related costs</p> <p>Elements that can be legitimately considered commercially confidential (such as individual salaries and fees) should be designated as such in accordance with the principles of this viability guidance. This policy is necessary to enable residents affected and the wider public to objectively evaluate all possible options' viability, costs and benefits, and to ensure</p>	
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	<p>that all residents of all tenure and landlords make fully informed decisions.”</p> <p>We are aware of the Blackwall Reach and Robinhood Garden Regeneration Scheme where a “like for like” option was included by the council; which only supports that this can be included and achieved if the council wish to implement it. A “Viability Option Policy” on “like for Like” will only firmly ensure that the local people who are asked to sacrifice for regenerations are then able to remain in their local area</p> <p>We hope that you will consider the above and implement the recommended policy mentioned above into the councils new “Viability Option Policy”</p>	
142	DVSPD19 – Canary Wharf Community Organisation	
143	<p>CWCO welcomes Tower Hamlets Draft development Viability guidance for its intention to provide the public with information necessary to scrutinise developer’s viability assessments and options, which details assumptions about costs and revenues when submitting planning applications. We support the aims, of maximising affordable housing provision (although we would like to see more social housing than affordable) and enabling public debate about how revenues from developments are divided between different interests and public benefits. As elders and pensioners, you may not be surprised that as an elders group we are interested in how you will define the value the “real cost of lives and care”.</p>	<p>Noted.</p>
144	<p>However, we are very concerned that the draft policy as it stands does not require social, private landlords and their developer partners to publish any detailed information about all possible options for the 'affected individual lives' especially those elders that live in private rented or own properties - at the crucial 'option appraisal' stage.</p>	<p>The 'Options Appraisal' stage of Estate Regeneration is not formally part of the planning process so requiring the publication of financial information relating to this stage would be challenging for the Council to enforce.</p> <p>The Council does however want to make sure residents are as informed as possible in such situations. The Council has amended the SPD to encourage the provision of such information, where possible.</p>
145	<p>Currently, the policy also omits to calculate the "real cost of lives and</p>	<p>The concerns in this regard are noted. The issues identified fall outside the</p>

	<p>care" especially those vulnerable adults who are in or entering into care. The option when considering life changing situation or has a possibility of a "Compulsory Purchase Order (CPO)" of their only lifetime asset; the viability option should consider and calculate "Real cost of lives and care" figures and incorporate that within the viability options. Surely the council does not want to see any owner occupier being worse off in this life changing situation by any regeneration, acquire or demolition. The absence of a "real cost of lives and care" in the viability option will seem a deprivation among a certain group of older home owners who cannot afford to remain within the same area, ambience and surroundings as they have for many years. Currently home owners (i.e. Leaseholders, Share of Freehold and Freeholders) are entitled to "Free Care if they are living in their own property but if they have some sort of savings then they are expected to pay for their care. If the person is to move under CPO the elderly person/pensioner maybe lumbered with a hefty bill to receive care. As the council's ambition is to be much more inclusive of all options and believes that "No one should be Worse off"; especially venerable elderly residents; we believe this is the right time for this council to adapt the proposed policy as outlined below. This will also give this council (LB Tower Hamlets) to be the first in pioneering such policy.</p>	<p>scope of a supplementary planning document which cannot set out new policy but rather just requirements relating to existing policies.</p> <p>The Council is in the process of renewing its Local Plan which is a policy document that is better placed to address issues such as this.</p> <p>Your comments will be passed onto our Local Plan Team. In addition, I recommend you keep an eye out for a version of the Council's Local Plan which will be published later on this year (likely from early October time).</p>
<p>146</p>	<p>You would agree that, it will be terrible omissions, because it means that residents facing life changing situations and the possible demolition of their homes are unlikely to be given the detailed information necessary to scrutinise and judge all possible options for the future of their homes, finance and care at a stage when they really do need it, at time crucial time of dramatic changes or alternatives. As a result, developers could dismiss options, (or policies such as fully delivering a 'real cost of lives and care' as 'not viable,' without publishing the assumptions and financial details to support such a conclusion) Therefore, we strongly urge the council to add the following policy to its Viability Guidance:</p> <p>Any loss of homes by demolition by any developers, any landlords or developers considering the redevelopment of their properties or estates where demolition of homes may be proposed will be required to publish full viability information at the option appraisal stage on all possible</p>	<p>Please refer to comments above.</p>

	options inclusive of "real cost of lives and care"	
147	<p>As you are aware currently if you are living in an area for 20 years (or a certain period as per guidance) and you are disturbed by a nearby development; the developer has to calculate the deprivation of sun and day light and also other various compensations from dust to noise. But currently there are no options to compensate for the time spent in the local area which one has to withdraw from or leave due to the development. And mostly it is the elders, pensioners and vulnerable adults that pay the price the most. They have to move away to an unknown area up-rooting themselves to make way for the new development. This crucial element of deprivation should have a value and should be calculated, shared and published in the future viability option(s).</p> <p>Published information should also include all the assumptions and financial details that the landlord inevitably has to prepare to evaluate option(s) itself, including: costs of future care of any vulnerable persons currently living in those said or marked properties with a "real cost of lives and care" options. The housing costs for such persons to stay in a suitable accommodation including residential care should be considered within the viability option(s) and awarded to the vulnerable adult who may be entitled to. As you know the policy on social and health care is to pay your way if you have any amount more than £16,000 in your account. A CPO of any property in Tower Hamlets will exceed this amount and thus, the individual will have to pay for their care should he/ she would consider entering into a care home with this move. Therefore this should be borne by the developers for those who may qualify (at least for a limited period)</p> <p>Elements that can be legitimately considered commercially confidential (such as individual, salaries and fees) should be designated as such in accordance with the principles of this viability guidance, but should be considered by the council officers to ensure that they are genuinely "Commercially Viable" and not labelled to hide from publication. This policy is necessary to enable residents affected and the wider public to</p>	Please refer to comments above.

	objectively evaluate all possible options' viability, costs and benefits, and to ensure that all leaseholder and freeholders make fully informed decisions.	
148	<p>In summary, the council should consider including the following two policies within the new 'Viability Option Policy':</p> <p>1) To evaluate and compensate the time of the residency of an elder, pensioner or vulnerable adult; streamlining to that of the sun and daylight policy</p> <p>2) To evaluate and compensate those who are considering to move into a care home (or to receive any other form of care) due to this development which may have an adverse impact on their finance</p>	Please refer to comments above.

PUBLIC CONSULTATION: DEVELOPMENT VIABILITY SUPPLEMENTARY PLANNING DOCUMENT

The Council is consulting on a draft Development Viability Supplementary Planning Document (SPD) from 5pm 31st January 2017 to 5pm 14th March 2017.

The SPD provides clear guidance on the information requirements for financial viability assessments and the basis on which these will be assessed and made public. The SPD will ensure that all planning applications are dealt with efficiently, consistently and with transparency.

Once adopted, the Development Viability SPD will be a material consideration in the determination of planning applications in Tower Hamlets.

The documents can be viewed on the Council's website: www.towerhamlets.gov.uk/viability and at the locations listed below (right):

A consultation event for the public will be held in respect of the consultation. Please refer to the web page listed above or contact the Infrastructure Planning Team for more information on this event.

How to make Comments

Comments should be made electronically or in writing in the following ways:

Email:

Joseph.Ward@towerhamlets.gov.uk

Post:

Development viability SPD Consultation
Infrastructure Planning Team
London Borough of Tower Hamlets
2nd Floor Mulberry Place
PO Box 55739
5 Clove Crescent
London E14 1BY

More Information

For more information please refer to the Council's website, www.towerhamlets.gov.uk/viability, or contact the Council's Infrastructure Planning team on 020 7364 5009 or by email to Joseph.Ward@towerhamlets.gov.uk. Please note, the consultation closes at 5pm 14th March 2017 and the Council is not able to consider any late responses.

Documents can be inspected at:

Tower Hamlets Town Hall, Mulberry Place,
5 Clove Crescent, London E14 2BG

Idea Store Bow, 1 Gladstone Place,
Roman Road, Bow, London E3 5ES

Idea Store Canary Wharf,
Churchill Place, London E14 5RB

Idea Store Chrisp Street,
1 Vesey Path East India Dock Road,
London E14 6BT

Idea Store Whitechapel,
321 Whitechapel Road, London E1 1BU

Idea Store Watney Market,
260 Commercial Road, London E1 2FB

Bethnal Green Library,
Cambridge Heath Road, London E2 0HL

Cubitt Town Library,
Strattondale Street, London E14 3HG



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THE LONDON BOROUGH OF TOWER HAMLETS

The Town and Country Planning (Local Planning) (England) Regulations 2012

Notice of adoption of the Development Viability Supplementary Planning Document (SPD)

In accordance with Regulations 11 and 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012, notice is given that the London Borough of Tower Hamlets adopted its Development Viability Supplementary Planning Document (SPD) on **2nd October 2017**.

Development Viability SPD

The SPD provides greater clarity to applicants regarding the Council's approach to assessing viability and will help to avoid delays in the decision making process. It supports the implementation of policies in the Council's Local Plan including the provision of affordable housing.

Any person with sufficient interest in the decision to adopt either of the above SPDs may apply to the High Court for permission to apply for judicial review of the decision. Any such application must be made promptly and in any event not later than 3 months after the date on which the SPD was adopted (**2nd October 2017**).

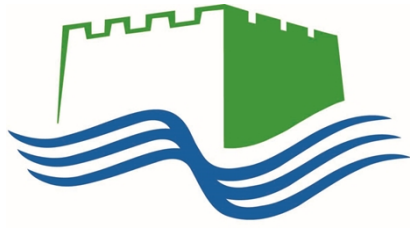
The adopted SPDs, the adoption statements and the SPD consultation statements can be viewed on the Council's website at www.towerhamlets.gov.uk/viability or can alternatively be inspected at the following locations:

- London Borough of Tower Hamlets Town Hall, Mulberry Place, 5 Clove Crescent, E14 2BG
- Idea Store Bow, 1 Gladstone Place, Roman Road, Bow, London, E3 5ES
- Idea Store Whitechapel, 321 Whitechapel Road London, E1 1BU
- Idea Store Watney Market, 260 Commercial Road, London, E1 2FB
- Idea Store Canary Wharf, Churchill Place, London, E14 5RB
- Idea Store Chrisp Street, 1 Vesey Path East India Dock Road, London, E14 6BT
- Bethnal Green Library, Cambridge Heath Road, London, E2 0HL
- Cubitt Town Library, Strattondale Street, London, E14 3HG

For further information on opening times please visit: www.ideastore.co.uk and www.towerhamlets.gov.uk for Mulberry Place (Town Hall).

If you wish to discuss the development Viability SPD you can contact the Development Viability Team on 0207 364 2343/1666 or please email us at viability@towerhamlets.gov.uk

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TOWER HAMLETS

**SEA Screening Determination Letter and
Sustainability Appraisal Review**

**Development Viability Supplementary Planning
Document**

July 2017



1. Background

- 1.1 This document considers whether the Council's Development Viability Supplementary Planning Document (SPD) should be subject to a Strategic Environmental Assessment (SEA) and provides a Sustainability Appraisal Review. This document constitutes the Council's Determination Letter and accompanying Statement of Reasons.

2. The Development Viability SPD

- 2.1 The economic viability of development has become an important consideration, both in terms of plan-making and when determining planning applications. This is established in the National Planning Policy Framework (NPPF) which requires that the costs of any requirements applied to a development should allow for competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 2.2 The Development Viability SPD has been prepared to provide clear guidance on viability for all types of development. This will assist developers, agents and planners while preparing and assessing planning applications in Tower Hamlets.
- 2.3 The Development Viability SPD will be a material consideration in the determination of planning applications in Tower Hamlets.

3. Purpose of this SA Review

- 3.1 A Sustainability Appraisal considers the potential impacts of a planning policy document on the environment, the economy and society. It does this by assessing the extent to which the planning document will help achieve a set of objectives that cover a range of issues, including air quality, landscape, water, health and the population. The Sustainability Appraisal also has to satisfy the requirements of the EC Directive 2001/42/EC on the assessment of the effects of certain planning documents and programmes on the environment (known as the Strategic Environmental Assessment [SEA] Directive).
- 3.2 There is no longer a statutory requirement for the Council to produce a Sustainability Appraisal for Supplementary Planning Documents (SPD); however, the requirement remains for Development Plan Documents (DPD). A Sustainability Appraisal was undertaken for the Council's Core Strategy 2010 and the Managing Development Document 2013.

- 3.3 Although it is not a statutory requirement to prepare a Sustainability Appraisal for SPDs, in pursuing best practice the Council has undertaken a Sustainability Appraisal Review for the Development Viability SPD. This Sustainability Appraisal review does not constitute a Sustainability Audit satisfying the EC Directive 2001/42/EC (or accompanying regulations), however, it will enable the Council to ensure that the social, economic and environmental impacts of the Development Viability SPD have been considered and that the SPD is a robust and coherent document that considers all aspects of sustainability. This document will also provide an efficient method of determining if the SPD is compatible with the sustainability objectives established in the Sustainability Appraisal for the Core Strategy.
- 3.4 The Development Viability SPD is also supported by Equality Analysis Quality Assurance Checklist.

4. SEA Screening Determination

Legislation

- 4.1 In accordance with the requirements of regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004, the Council has determined that this SPD should not be subject to a Strategic Environmental Assessment (SEA) as the document provides information to supplement existing DPDs (Core Strategy 2010 and the Managing Development Document 2013), and is therefore considered to be a minor addition to these documents.
- 4.2 The Sustainability Appraisal Review also fulfils the function of a statement of the Council's reasons for its determination that SEA is not required.
- 4.3 Comments are able to be made on the content of this document during the consultation and engagement period. The Council will be consulting with the relevant statutory consultees alongside other interested individuals, groups and organisations.

Previous SEAs

- 4.4 The Council has previously undertaken a Sustainability Appraisal for the Core Strategy. The Sustainability Appraisal for the Core Strategy also satisfied the requirements of the EC Directive 2001/42/EC and SEA Regulations on the assessment of the effects of certain plans and programmes on the environment.
- 4.4 The Development Viability SPD is a supplementary document to the Core Strategy and as such is considered to be in-keeping with what

has already been assessed within the Core Strategy Sustainability Appraisal. Therefore a SEA is not required.

5. Decision (Determination Letter)

- 5.1 This Determination Letter considers the Development Viability SPD in relation to the assessments undertaken for the Core Strategy, to determine whether there would be any new likely significant effects.
- 5.2 Consideration has been given to the likely significant effects on the environment, including on issues, such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- 5.3 Regulation 5(6) identifies when an environmental assessment does not need to be carried out, which is either the use of a small area at local level, or for a minor modification to a plan or programme, unless it has been determined that it is likely to have significant environmental effects.
- 5.4 The Development Viability SPD does not introduce new processes, rather it will provide guidance on the existing information requirements for financial viability assessments and the basis on which these will be assessed and made public. This will ensure that all applications are dealt with efficiently, consistently and with transparency.
- 5.5 LBTH has determined that a SEA is not required as the Development Viability SPD is a 'minor modification' of a previous plan and significant effects are not likely.
- 5.6 Regulation 9 (3) of the SEA Regulations requires that where it has been determined that a plan or programme is unlikely to have significant effects (and accordingly does not require an environmental assessment) a Statement of Reasons should be prepared. This is set out in Table 3.

6. Consultation

- 6.1 A copy of this SEA Determination Letter and Statement of Reasons can be viewed online here:

<http://www.towerhamlets.gov.uk/viability>
- 6.2 A copy will also be available for inspection by the public as at the Town Hall, Mulberry Place, 5 Clove Crescent, London E14 2BG.

6.3 If you require any further assistance, please contact the Development Viability Team on 020 7364 2343/1666 or email viability@towerhamlets.gov.uk

7. Development Viability SPD Context

7.1 Table 1 below provides an overview of the legislative and policy context for the Development Viability SPD.

Legislative Context	<ul style="list-style-type: none">• The Town & Country Planning Act 1990.• The Community Infrastructure Levy Regulations 2010 (Regulation 122 and Regulation 123).
Policy and Guidance Context	<ul style="list-style-type: none">• The National Planning Policy Framework (NPPF);• Planning Practice Guidance associated with the NPPF;• The London Plan• Tower Hamlets' Local Plan. It has also been formed to be consistent with the Council's emerging Local Plan;• The Mayor of London's Housing SPG;• The Mayor of London's Affordable Housing and Viability SPG.

8. Sustainability Appraisal Review

- 8.1 The objectives from the Core Strategy's SA have been used to assess the Development Viability SPD. The purpose of this exercise is to identify any negative impacts in the SPD, and where appropriate identify mitigation measures. The results of this assessment are set out in Table 3: Statement of Reasons.
- 8.2 In general, it is considered that the Development Viability SPD will contribute to achieving the principles of sustainable development and is aligned with the SA objectives established in the Core Strategy. It performs well against the SA objectives and no instances were identified where the SPD would conflict with the SA objectives.
- 8.3 Table 3 presents the results of the assessment against each SA objective using the key below in Table 2. Effects are permanent and of borough wide significance unless indicated otherwise in the commentary box.

Table 2: Criteria for Determining Significance of the Effect

Potential for significant positive effect	++
Potential for a minor positive effect	+
No relationship	N/A
Potential for a minor negative effect	-
Potential for significant negative effect	--
Uncertainty	?

Table 3: Statement of Reasons

Sustainability Objective and Questions to Consider <i>As set out by the Sustainability Appraisal of the Core Strategy (2009)</i>	Objective Met?	Comments	Recommendations / Mitigation
<i>Environmental</i>			
<p>Biodiversity: To conserve and enhance natural habitats and wildlife and bring nature closer to people.</p> <ul style="list-style-type: none"> • Will it conserve and enhance habitats and species in accordance with the Local Biodiversity Action Plan. In particular, will it avoid harm to national or London priority species and designated sites and habitats and species identified in the Local Biodiversity Action Plan? • Will it provide for the long-term management of natural habitats and wildlife? • Will it improve the quality and extent of designated and non-designated sites with the intention of achieving a net gain in biodiversity? • Will it provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats) for example by integrating the creation of new habitats into the design of new buildings and areas? • Will it protect and enhance the borough's water bodies to achieve a good ecological status? • Will it promote, educate and raise awareness of the 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.

<p>enjoyment and benefits of the natural environment?</p> <ul style="list-style-type: none"> • Will it bring nature closer to people, especially in the most urbanised parts of the borough, for example through the use of green and brown roofs? • Will it improve access to areas of biodiversity interest? • Will it enhance the ecological function and carrying capacity of the green space network? 			
<p>Water Quality & Water Resources: To improve the quality of surface waters and groundwater and to achieve the wise management and sustainable use of water resources.</p> <ul style="list-style-type: none"> • Will it reduce discharges to surface and groundwater? • Will it support sustainable urban drainage? • Will it improve the water systems infrastructure (e.g. water supply/sewerage)? • Will it reduce abstraction from surface and groundwater sources? • Will it reduce water consumption? • Will it encourage the consideration of the water cycle? 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.
<p>Natural Resources: To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured local products.</p> <ul style="list-style-type: none"> • Will it reduce the demand for natural resources and raw materials from unsustainable sources? • Will it encourage the prudent and efficient use of natural resources? • Will it encourage the use of local sustainable 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.

products? <ul style="list-style-type: none"> • Will it reduce the extraction of minerals? • Will it reduce the borough's ecological footprint per capita? 			
<p>Climate Change: To address the causes of climate change through minimising the emissions of greenhouse gases and ensuring that London is prepared for its impacts.</p> <ul style="list-style-type: none"> • Will it minimise emissions of greenhouse gases? • Will it help London meet its emissions targets? • Will it reduce the numbers of cars entering London's congestion charge zone? • Will it protect the borough from climate change impacts? • Will it avoid exacerbating the impacts of climate change? • Will it help the borough adapt to the impacts of climate change? • Will it minimise the risk of flooding from rivers and watercourses to people and property? • Will it manage existing flood risks appropriately and avoid new flood risks? 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.
<p>Air Quality: To improve air quality</p> <ul style="list-style-type: none"> • Will it improve air quality? • Will it help to reduce emissions of PM10, NO₂? • Will it reduce emissions of ozone depleting substances? • Will it help to achieve national and international standards for air quality (for example, those set out in the Air Quality Regulations 2000 and (Amendment) Regulations 2002? (See objective 10 for further 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.

details on transport criteria including the provision of infrastructure to achieve a modal shift)			
<p>Energy: To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.</p> <ul style="list-style-type: none"> • Will it reduce the demand and need for energy? • Will it promote and improve energy efficiency (e.g. buildings)? • Will it increase the proportion of energy both purchased and generated from renewable and sustainable resources? 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.
<p>Waste: To minimise the production of waste across all sectors and increase reuse, recycling, remanufacturing and recovery rates.</p> <ul style="list-style-type: none"> • Will it minimise the production of household and commercial waste? • Will it promote reuse and recycling (e.g. in the design of housing or promoting recycling schemes in existing building stock etc) particularly in high density developments? • Will it help the borough achieve its statutory waste recycling targets? • Will it help to promote a market for recycled products? 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.

<p>Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed in a sustainable way.</p> <ul style="list-style-type: none"> • Will it protect and enhance sites, features and areas of historical, archaeological and cultural value/potential and their settings? • Will it conserve and enhance the townscape/cityscape character including the protection of views and landmark buildings? • Will it promote access to the historic environment and also contribute to better understanding of the historic environment? • Will it promote high quality design and sustainable construction methods? • Will it respect visual amenity and the spatial diversity of communities? • Will it enhance the quality of the public realm? • Will it protect and enhance areas of open space? • Will it promote the creation of new accessible local parks and facilities on the City Fringe? • Will it improve access to open space and improve the quality and quantity of publicly accessible greenspace? 	<p>N/A</p>	<p>Objective falls outside the remit of the SPD.</p>	<p>Objective addressed through Core Strategy and MDD policies.</p>
<p><i>Social Objectives</i></p>			
<p>Housing: To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.</p> <ul style="list-style-type: none"> • Will it reduce homelessness? 	<p>++</p>	<p>The SPD will provide guidance on the information requirements for preparing and</p>	<p>Planning applications will also need to have regard to housing policies in the Core</p>

<ul style="list-style-type: none"> • Will it reduce the number of unfit homes, including those owned by Registered Social Landlords? • Will it reduce overcrowding? • Will it increase the range and affordability (both upfront and over its lifetime) of housing (taking into account different requirements and preferences of size, location, type and tenure)? • Will it ensure that appropriate services and facilities are in place for the new population? • Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle? • Will it increase the number of Local Authority dwellings that meet the 'decent homes' standard? • Will it increase use of sustainable design and sustainable building materials in construction? • Will it improve energy efficiency and insulation in housing to reduce fuel poverty and ill health? • Will it provide housing that encourages a sense of community and enhances the amenity value of the community? 		<p>assessing financial viability assessments. This will help the Council ensure that developments provide the maximum reasonable level of affordable housing.</p> <p>The provision of affordable housing will therefore remove some of the barriers to home ownership and will benefit existing and future residents of the borough that are in need of affordable housing.</p>	<p>Strategy and MDD with regard to design, amenity, sustainability, accessibility, energy efficiency and place-making.</p>
<p>Liveability and Place: To create and sustain liveable, mixed use physical and social environments that promote long- term social cohesion, sustainable lifestyles and a sense of place.</p> <ul style="list-style-type: none"> • Will it create and sustain vibrant and diverse communities and encourage increased engagement in recreational, leisure and cultural activities? • Will it increase the provision of culture, leisure and recreational activities for all: this could include quality, affordable and healthy food, as well as cultural, sporting, or leisure opportunities including those associated with the Olympic legacy? 	<p>++</p>	<p>The SPD will ensure that the borough's objectives for the delivery and design of affordable housing are taken into account in new developments which provide a mix of tenures, to meet the needs of all residents.</p>	<p>Planning applications will also need to have regard to housing policies in the Core Strategy and MDD with regard to design, amenity, sustainability, accessibility, energy efficiency and place-making.</p>

<ul style="list-style-type: none"> • Will it provide opportunities for people to choose an active, fulfilling life? • Will it increase the provision of key services, facilities and employment opportunities? • Will it positively enhance and promote the perceived sense of place held by the community? • Will it protect and enhance the provision of open space? • Will it encourage a mix of land uses? • Will it reduce the urban heat island effect associated with increasingly dense development? 			
<p>Education and Skills: To maximise the education and skills levels of the population.</p> <ul style="list-style-type: none"> • Will it increase the opportunities for educational and vocational goals to be achieved through employment and entrepreneurial opportunities? • Will it provide the infrastructure to help increase the levels of participation and attainment in education? • Will it improve overall achievement of the borough's primary and secondary school children? • Will it help improve employee education/training programmes? • Will it help improve the qualifications and skills of young people? • Will it help promote lifelong learning activities? • Will it help support the voluntary sector and promote volunteering? • Will it help promote sustainable development education? • Will it help reduce skills shortages? • Will it help to reduce the disparity in educational 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.

<p>achievement between different ethnic groups?</p> <ul style="list-style-type: none"> • Will it promote multiple uses of schools? 			
<p>Ownership and Participation: To promote civic participation, ownership and responsibility and enable individuals, groups and communities to contribute to decision-making at neighbourhood, borough and regional levels in London.</p> <ul style="list-style-type: none"> • Will it promote social cohesion and encourage engagement in community activities? • Will it increase the ability of people to influence decisions? • Will it support civic engagement and encourage the involvement and participation of a diverse range of stakeholders? • Will it promote community spirit and encourage community networks? • Has consideration been given to cross boundary issues and the potential for working in conjunction with other authorities? 	+	<p>The SPD will provide guidance on the information requirements for preparing and assessing financial viability assessments. This will help the Council ensure that developments provide the maximum reasonable level of affordable housing.</p> <p>The provision of affordable housing will contribute positively to civic participation, the delivery of balanced and sustainable communities and hopefully increase trust in the planning system.</p>	<p>Developers are encouraged to undertake community engagement with local residents and stakeholders. The Council also undertakes consultation with local residents and stakeholders during the Planning Application stage.</p>
<p>Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.</p> <ul style="list-style-type: none"> • Will it reduce poverty and health inequalities? • Will it improve mental wellbeing? • Will it improve access to high quality public services 	+	<p>The SPD will provide guidance on the information requirements for preparing and assessing financial viability assessments.</p>	<p>Further assessment to be undertaken at the planning application stage and through the negotiation of the</p>

<p>(including health facilities)?</p> <ul style="list-style-type: none"> • Will it address the causes of key health issues including high rates of cardio-vascular disease and lung cancer? • Will it create an environment that will promote and support physical activity and other healthy behaviours?? • Will it improve access by active travel means such as walking, cycling and public transport? 		<p>This will help the Council ensure that developments provide the maximum reasonable level of affordable housing.</p> <p>The provision of more affordable housing will contribute positively to the physical and mental well-being associated with the provision of appropriate housing which is of high quality and meets specific needs such as bedroom sizes and accessibility.</p>	<p>planning obligation, to ensure the health and well-being of the boroughs residents is maximised.</p>
<p>Safety and Security: To enhance community safety by reducing crime, antisocial behaviour and the fear of crime.</p> <ul style="list-style-type: none"> • Will it help reduce the number of vehicle crimes? • Will it help reduce the number of burglaries? • Will it help reduce the number of racial incidents? • Will it reduce the fear of crime? • Will it reduce antisocial behaviour? • Will it reduce actual noise levels and disturbances from noise? • Will it reduce the risk of terrorist attack? 	<p>N/A</p>	<p>Objective falls outside the remit of the SPD.</p>	<p>Objective addressed through Core Strategy and MDD policies.</p>
<p>Equality and diversity: To ensure equitable outcomes for all communities, particularly those most liable to</p>	<p>N/A</p>	<p>An Equality Analysis Quality Assessment</p>	<p>The SPD is also subject to an</p>

<p>experience discrimination, poverty and social exclusion.</p> <ul style="list-style-type: none"> • Will it reduce poverty and social exclusion in those areas and communities most affected? • Will it promote a culture of equality, fairness and respect for people and the environment? • Will it promote equality for black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, older people, young people, children and faith groups? • Will it benefit the equality target groups listed above? 		<p>Checklist has been undertaken and has identified that the Development Viability SPD is unlikely to have any impacts on any particular equalities groups.</p>	<p>Equalities Analysis.</p>
<p>Economic Objectives</p>			
<p>Accessibility / Availability (Transport): To maximise the accessibility to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car).</p> <ul style="list-style-type: none"> • Will it encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing and use of waterways)? • Will it provide the infrastructure required to achieve a modal shift to more sustainable forms of transport? • Will it reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? • Will it reduce traffic volumes and traffic congestion? • Will it reduce the length of commuting journeys? • Will it help to provide a more integrated transport service from start to finish i.e. place of residence to point of service use or place of employment? • Will it increase the capacity of public transport? 	<p>N/A</p>	<p>Objective falls outside the remit of the SPD.</p>	<p>Objective addressed through Core Strategy and MDD policies.</p>

<ul style="list-style-type: none"> • Will it increase the number of sub-regional and orbital public transport routes that reduce reliance on the car? • Will it promote locally-based employment? • Will it improve accessibility to work by public transport, walking and cycling? • Will it reduce road traffic accidents? • Will it promote inter-borough connectivity? 			
<p>Regeneration & Land Use: To stimulate regeneration and urban renaissance that maximises benefits for the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.</p> <ul style="list-style-type: none"> • Will it provide a viable network of complementary centres? • Will the regeneration have immediate and long-term benefits for deprived areas? • Will it help to make people feel positive about the area they live in? • Will it help to create a sense of place and 'vibrancy'? • Will it help reduce the number of vacant and derelict buildings? • Will it minimise the loss of soils to development? • Will it improve soil quality and tackle contamination? 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.
<p>Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.</p> <ul style="list-style-type: none"> • Will it generate satisfying and rewarding new jobs? • Will it help to provide employment in the most 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.

<p>deprived areas and stimulate regeneration?</p> <ul style="list-style-type: none"> • Will it reduce overall unemployment, particularly long-term unemployment? • Will it help to improve levels of income and help to deliver a living wage to all? • Will it encourage flexibility of work, including voluntary and part-time work? • Will it encourage volunteering and promote the value of unpaid work? • Will it encourage the development of healthy workplaces? • Will new employment opportunities be well served by public transport? 			
<p>Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses and their environmental, social and economic performance.</p> <ul style="list-style-type: none"> • Will it improve sustainable business development? • Will it improve the resilience of business and the economy? • Will it help to diversify the economy? • Will it prevent the loss of indigenous businesses? • Will it encourage business start-ups and support the growth of businesses? • Will it encourage ethical and responsible investment? • Will it reduce levels of deprivation? • Will it safeguard the best of the employment land portfolio? • 	N/A	Objective falls outside the remit of the SPD.	Objective addressed through Core Strategy and MDD policies.
<p>Creativity and Innovation: To promote creativity and</p>	N/A	Objective falls outside	Objective addressed

<p>innovation in the environmental and social economy (including new clean technologies, renewable energy, pollution control and the skills sector).</p> <ul style="list-style-type: none"> • Will it help to diversify the economy? • Will it encourage investment in new technologies, new solutions, new plans and new ideas that contribute to achieving progress towards sustainability? • Will it boost the green technology sector? 		<p>the remit of the SPD.</p>	<p>through Core Strategy and MDD policies.</p>
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EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST



Name of 'proposal' and how has it been implemented (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)	Development Viability Supplementary Planning Document (SPD)
Directorate / Service	Place / Planning & Building Control (Infrastructure Planning)
Lead Officer	Joseph Ward
Signed Off By (inc date)	Joseph Ward, 17/07/2017
Summary – to be completed at the end of completing the QA (using Appendix A) (Please provide a summary of the findings of the Quality Assurance checklist. What has happened as a result of the QA? For example, based on the QA a Full EA will be undertaken or, based on the QA a Full EA will not be undertaken as due regard to the nine protected groups is embedded in the proposal and the proposal has low relevance to equalities)	<div style="display: flex; align-items: flex-start;"> <div style="width: 20px; height: 20px; background-color: green; margin-right: 10px;"></div> <div> <p>Proceed with implementation</p> <p>The Development Viability SPD will provide guidance on the information requirements for financial viability assessments and the basis on which these will be assessed and made publicly available. This will ensure that all applications are dealt with efficiently, consistently and with transparency. The Councils financial viability assessments are in line with national, regional and local planning policy.</p> <p>It is not envisaged that the Development Viability SPD will have any impacts on any particular equalities groups.</p> </div> </div>

Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
1	Overview of Proposal		
a	Are the outcomes of the proposals clear?	Y	The SPD will provide guidance on when a financial viability

			assessment is required, what methodology should be followed and the basis on which financial viability assessment will be assessed by the council.
b	Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?	Y	Staff, residents and planning applicants will have a clearer understanding of the information requirements for financial viability assessments that are required to be submitted in support of planning applications. The equality profile of residents is available from the Census or GLA population data/projects.
2	Monitoring / Collecting Evidence / Data and Consultation		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Y	It is not envisaged that the SPD will have any unequal impacts on the nine protected groups. The SPD will be the subject of two consultations prior to adoption. This will ensure that the public have an opportunity to comment prior to the SPD being adopted.
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Y	The equality profile of residents is available from the Census or GLA population data/projects.
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Y	The SPD was formed in a cross Council working group and will be the subject of a public consultation. This checklist has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Y	The local community and key stakeholders have been consulted appropriately as required by the Council's Statement of Community Involvement.
3	Assessing Impact and Analysis		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	Y	It is not envisaged that the SPD will have any unequal impacts on the nine protected groups.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	Y	It is not envisaged that the SPD will have any unequal impacts on the nine protected groups.
4	Mitigation and Improvement Action Plan		

a	Is there an agreed action plan?	N/A	Not required.
b	Have alternative options been explored	N/A	Not required, the alternative would be to continue without a SPD. However, the adoption of a SPD is considered to be the best way forward as it will ensure planning applicants and the Council have a clear understanding of what is required while preparing and assessing financial viability assessments.
5	Quality Assurance and Monitoring		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Y	Following the consultations, if appropriate, the SPD will be referred to Cabinet for approval to adopt.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	Y	Equalities matters will be considered in any Cabinet report for adoption. If appropriate, a plan will be formed to track any impacts across protected characteristics at this time.
6	Reporting Outcomes and Action Plan		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Y	Yes

Appendix A - Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the QA checklist, it is evident that due regard is not evidenced in the proposal and / or a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the proposal be suspended until further work or analysis is performed – via a the Full Equality Analysis template	Suspend – Further Work Required	Red: 
As a result of performing the QA checklist, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 

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**Draft Development Viability
Supplementary Planning Document
(SPD)**

Consultation Report

April 2017

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Section 1: Introduction

What is the Development Viability Supplementary Planning Document (SPD)?

- 1.1 Paragraph 173 of the National Planning Policy Framework (NPPF) requires that Development Plan Policies and Planning Obligations are considered in terms of their impact on the viability of a development.
- 1.2 The Development Viability SPD sets out a number of important measures the Council considers will:
 - Enhance public participation in planning;
 - Support the compliance of planning regulations and guidance;
 - Provide certainty to applicants and developers;
 - Help maximise the benefits of development for local people.
- 1.3 The SPD sets out the Council's requirements for Financial Viability Assessments (FVAs) to be made public and the process for assessing these appraisals. It will ensure the assessment of the viability of planning applications is efficient, consistent and transparent.
- 1.4 The document supports the Development Plan by providing further detail on how we will implement our planning policies where viability is an issue.

What is this Consultation Report?

- 1.5 This report explains the consultation on the Draft SPD that took place from the 31/01/2017 to 14/03/2017 and how comments that individuals and organisations have made have been taken into account and how they have influenced changes to the SPD.
- 1.6 The consultation undertaken was done so in accordance with both local and regulatory requirements. The Council's local requirements are set out in our Statement of Community Involvement (SCI) (2012) which explains how the Council consults on planning policy documents and also on planning applications. The Council's Regulatory requirements arise from Town and Country Planning (Local Planning) (England) Regulations 2012.

Where to get more information

- 1.7 The draft Development Viability SPD and associated documents can all be viewed at our website:
<http://www.towerhamlets.gov.uk/viability>
- 1.8 Copies are also available by contacting the Infrastructure Planning Team at:

Infrastructure Planning Team
London Borough of Tower Hamlets
Mulberry Place
5 Clove Crescent
London
E14 1BY
Email: viability@towerhamlets.gov.uk
Tel: 020 7364 2343 / 0207 7364 1666

What happens next?

- 1.9 The SPD will be the subject of one further consultation from 27/04/2017 to 08/06/2017. Following this, the consultation responses received will be considered and the final version of the SPD will be formed and referred to the Mayor in Cabinet for approval to adopt. If adopted, the impact and effectiveness of the SPD will be monitored on an ongoing basis.

Section 2: Draft Development Viability SPD Consultation

- 2.1 The Council has undertaken an initial (Regulation 12) consultation on the SPD for a period of six weeks from 31/01/2017 to 14/03/2017.

Who was consulted and how?

- 2.2 We consulted a wide range of residents, developers, land owners and planning agents on the draft Development Viability SPD. The parties consulted consisted of statutory consultees as well as parties who have been active in Tower Hamlets in the past few years and all parties on the Council's consultation list which included all of the parties who were consulted as part of the Council's Regulation 18 version of its new draft Local Plan.
- 2.3 The extent of consultation described in the paragraph above means the Council met the requirements of the Statement of Community Involvement (2012) (SCI) and the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.4 The draft SPD was accompanied by a Consultation Statement which outlined how the Council consulted on the document and how parties were able to make representations.
- 2.5 Copies of the SPD and supporting documents were made available at the Town Hall and the Council's Idea Stores and main Libraries.
- 2.6 In addition, the Localism Act 2011 requires co-operation between local authorities and a range of other bodies and organisations as an integral part of the preparation of planning policy and guidance. This is called the "Duty to co-operate". The Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (2012) set out these prescribed bodies and further information on the need for local

authorities to work with these bodies and also their neighbouring boroughs on strategic planning issues and cross boundary issues. The Council engaged with these bodies as part of the consultation already undertaken.

Section 3: Representations on the Draft SPD

Responses received in respect of the consultation on the draft SPD

- 3.1 Thirteen formal representations were received in respect of the initial consultation on the SPD, from the following parties:

DVSPD01 – DS2 on behalf of Bishopsgate Goods Yard Limited
DVSPD02 - Gerald Eve on behalf of Crest Nicholson London
DVSPD03 - Carter Jonas on behalf of National Grid Property Holdings
DVSPD04 - Rolfe Judd Planning on behalf of various clients
DVSPD05 - The Canal & River Trust
DVSPD06 - Berkeley Group
DVSPD07 - DS2 on behalf of The Ballymore Group
DVSPD08 - Port of London Authority
DVSPD09 - Greater London Authority
DVSPD10 - CMA Planning on behalf of various clients
DVSPD11 - Environment Agency
DVSPD12 - Metropolis Planning and Design
DVSPD13 - Health and Safety Executive

- 3.2 The Council has endeavoured to distil the main points made in each representation and respond to each one. Please find attached at Appendix A a schedule of the main points made in the representations received and the Council's response to each point.

- 3.3 A number of matters were raised consistently in the representations received. Please find below a selection of the matters consistently raised alongside the Council's response to these points:

Matter 1: The Council's move towards transparency is welcomed.

The Council's Response: The Council notes the general welcoming of the move towards transparency and considers this key in encouraging public participation in the planning process.

Matter 2: Transparency: The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. This is not considered a flexible enough approach to deal with legitimate claims of commercial sensitivity.

The Council's Response: The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability

information as key to ensuring confidence in the planning system and that the process is open to scrutiny.

The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. The Council does not consider that changes to the proposed SPD are required in this regard.

Matter 3: Deliverability: Concern has been raised in respect of the SPDs requirement for any financial deficit a proposed scheme demonstrates to be shown in terms of its impact on profit.

The Council's Response: The requirement in paragraph 5.6 of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit. The SPD has been amended to provide better clarity in this regard and wording has been added to allow the inclusion of growth to account for deficits.

The wording of paragraph 5.6 has been amended slightly for clarity.

Matter 4: Benchmark Land Values: Some Representors consider the SPD is too definitive in terms of its preference for an 'Existing Use Value plus' approach.

The Council's Response: The SPD describes that in most cases Benchmark Land Values will be assessed with reference to an Existing Use Value plus approach. The Council considers this is consistent with emerging and adopted guidance from the Mayor of London and provides greater certainty to applicants.

Matter 5: Benchmark Land Values: Some Representors consider the SPD is too definitive in terms of it describing that the Council would generally not expect the level of premium above Existing Use Value for benchmark land values to exceed 20%.

The Council's Response: The Council acknowledges the issue highlighted in establishing an appropriate level of premium. In the Council's experience a premium of 20% is most commonly applied hence the SPDs reference to this level of premium generally.

Matter 6: Benchmark Land Values: The SPD describes that the use of Alternative Use Values will only be considered in the event of a planning permission for the alternative use being in place. Representors consider that this should not be the case.

The Council's Response: Whilst having a planning permission in place for the alternative use is not required, it is preferred. The SPD has been amended to reflect new requirements of when an Alternative Use Value can be adopted.

Matter 7: Viability Reviews – 60/40 surplus split: The SPD describes that any surplus identified as part of a viability review should be split 60/40 in favour of the Council. Representors consider a split in favour of the Council is not justified.

The Council's Response: The split described in the SPD is consistent with the split described in the Mayor of London's draft Affordable Housing and Viability

Supplementary Planning Guidance (SPG). It also provides an incentive for developers to maximise sales within their development and ensures sufficient additional contributions are provided in order to meet planning policy.

Matter 8: Viability Review: Representors raised concerns regarding the application of review mechanisms to smaller development, and the application of a review mechanism where a development has not reached substantial implementation in 24 months.

The Council's Response: The SPDs approach to Viability Reviews is consistent with the draft Mayor of London's Affordable Housing and Viability SPG. The Council will work with applicants/developers in respect of review mechanisms drafted in specific S106 agreements but consider it important to set out a framework in the SPD for the basis of the formation of these parts of the agreements.

Summary of the changes made to the SPD

3.4 A number of changes have been made to the SPD following consultation, including:

- A number of minor grammatical and spelling changes have been made to make the document more consistent and easier to understand.
- Paragraph 2.10 has been amended slightly so that it more accurately reflects the wording of the Viability and Decision-Taking Planning Practice Guidance.
- Section 3 (Key Requirements) has been amended to reflect changes made to the SPD as described above, as well as to remove a duplicate key requirement.
- Paragraph 4.7 has been amended to reflect the fact Financial Viability Assessments are required to be submitted where the application triggers a planning policy requirement and where the policy requirement is not met.
- Paragraph 4.7 has been amended to provide further clarity on where a Financial Viability Assessment is required to be submitted in respect of a Section 73 application.
- Paragraph 4.8 has been amended to reflect that an FVA may be required to be submitted in respect of a proposal that will lead to less than substantial harm to the significance of a designated heritage asset and that applicants should engage with the Council in relation to specific schemes. This is as opposed to a submission being required.
- Paragraph 4.12 has been amended to reflect that a revised FVA should be submitted prior to referral for decision as opposed to prior to decision. This is to ensure that fuller public participation can take place ahead of a scheme being referred to one of the Council's Development Committees.

- Paragraph 4.14 has been amended so that it clarifies that conclusions described in reviews of submitted FVAs should be backed up by evidence.
- Paragraph 5.7 in the initial version of the SPD has been deleted. The content has been added to paragraph 5.6 so that the SPD better reflects that where schemes would otherwise demonstrate a deficit that either growth assumptions or an adjustment of a profit assumption should be included.
- Paragraph 6.10 has been amended to reflect that build cost assumptions should reflect planning policy and where they don't justification should be provided.
- The wording of the table under paragraph 6.16 has been amended slightly to reflect the fact that economies of scale in respect of marketing costs may not occur in every case.
- A new paragraph (6.25) has been added to reflect the fact that the Council generally expects profit allowances related to residential development, including affordable housing, to be expressed as a % of GDV.
- The paragraph relating to the circumstances under which an alternative use value (AUV) may be used as a benchmark land value (paragraph 6.30 in the updated draft SPD) has been amended to reflect the fact that a planning permission is not necessarily required to apply an AUV. A number of criteria for when an AUV can be used have also been added.
- Paragraph 7.7 has been amended to reflect that profit will be accounted for in review mechanisms. In addition an amendment has been added to clarify how finance costs will be treated as part of a review.
- Paragraph 7.8 has been amended slightly to correct an error: It previously referred to surplus split allowances for review mechanisms should be split between the Council and the developer according to the profit agreed at application stage whereas the rest of the document referred to a 60/40 split in favour of the Council.
- A new paragraph (7.10) has been added to reflect the fact that the outcomes of triggered review mechanisms will be fed back to either the Council's Development Committee or Strategic Development Committee (or equivalent).
- A glossary of key technical terms has been added.
- The 'payments in lieu' equation in section 8 has been amended so that the payment required is specific to the development site in question.

- Formulas 1, 3 and 5 of Appendix B have been amended so they better reflect all of the matters that need to be considered as part of a review mechanism, as described in paragraph 7.7 of the SPD.
- Formulas 2 and 4 in Appendix B have been amended to reflect known London Affordable Rent and Intermediate values as opposed to averages.
- A new paragraph (5.12) has been added to reflect some further procedural and ethical requirements.

Summary of changes to supporting documents

3.5 The following amendments have been made to supporting documents:

SEA Screening Determination and Sustainability Appraisal Review (2017)

- This document has been reviewed. No substantial changes are required to the document which will be made available for comment as part of the second consultation on the SPD.

Consultation Statement (2017)

- A new Consultation Statement has been formed to describe how representations can be made in respect of the second consultation on the SPD.

Appendix A - Detailed summary of Representations and Council response

	Representation	Councils Response
1	DVSPD01 - DS2 on behalf of Bishopsgate Goods Yard Limited DVSPD07 - DS2 on behalf of The Ballymore Group	
2	A threshold approach to viability: BGY Regeneration Limited would question whether the 35% figure is too high for the large strategic sites, with notable constraints, such as The Goodsyard. There is also limited incentive to get to 35%, where schemes are less viable, and the LBTH must recognise that whilst an incentive is helpful, ultimately, a scheme must meet a range of developers and funders' criteria to be delivered. There is a long term linear relationship between consents and starts in the Borough, and to break this and get more schemes on site and ultimately more homes delivered, the LBTH should recognise the relationship between planning obligations and CIL, development profit and land value.	<p>The Mayor of London's draft Affordable Housing and Viability Supplementary Planning Guidance sets out the 'Threshold Approach' and describes that the 'threshold proposed is 35% of a scheme'.</p> <p>In addition the Council's affordable housing target is 35% - 50%.</p> <p>For these reasons the Council considers the 35% figure to be appropriate.</p>
3	Pre application advice - The SPD encourages the submission of a draft financial viability assessment. Whilst BGY Regeneration Limited support the initiative of early engagement, the level of detail known in terms of costs and values of the scheme during the pre-application stage varies on a scheme by scheme basis, especially for a scheme such as the Goodsyard, as the design constantly evolves up until the point of the planning submission. Depending upon the length of time from pre-application to planning submission, costs and values could substantially change due to reasons outside of the Applicant's control and therefore the affordable housing provision indicated at the pre-application stage could then be subject to change. These changes would then have to be further justified. BGY Regeneration Limited would like the SPD to reflect the level of information known at the time of pre-application will inform what information is made available in regards to the financial viability assessment.	<p>The Supplementary Planning Document (SPD) aims to encourage early submission of viability information to lessen the likelihood of viability discussions causing delays in decision-making. It does not require the submission of viability information at the pre-application stage.</p> <p>Paragraph 4.6 of the SPD acknowledges that the levels of detail that can be provided will vary from scheme to scheme. The Council does not consider any change to the document is necessary.</p>

4	<p>Transparency - The shift towards transparency is welcomed. BGY Regeneration Limited are very willing to share certain information as part of the planning process be it through the publication of information or through presentations on viability matters to Officers and Members. Certain information will not be made available; for example, information relating to funding agreements, rights to light liabilities or joint venture agreements. There is a real risk that too onerous application of this element of the SPD threatens a developer's commercial interests which is contrary to the tests as set out in the 2014 Environmental Regulations.</p>	<p>Noted that the shift towards transparency is welcomed.</p> <p>The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. As such, the Council does not consider that changes to the proposed SPD are required in this regard.</p>
5	<p>Deliverability - BGY Regeneration Limited are willing to provide this as a sensitivity analysis within the FVA. BGY Regeneration Limited and their funders would be unwilling and unable to reduce their profit expectations at the expense of delivering planning obligations nor should they be asked to in accordance with the NPPF which explicitly states a competitive return to a willing developer should be provided to enable the development to be deliverable. By reducing the profit expectations to satisfy LBTH that the development is deliverable simply increases the risk of the development not coming forward in the foreseeable future. Not all sites will be technically viable on a present-day basis. It is the Applicants decision to commit to the proposed level of planning obligations, should this indicate in the current day viability appraisal that the scheme is unviable, this doesn't necessarily mean that the scheme will be unviable in the foreseeable future. This is also key for determining viability reviews as the level of profit will need to be agreed at the date of consent so that once a viability review is undertaken it will still allow for a competitive return to the developer.</p>	<p>Noted. The requirement in paragraph 5.6 of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit.</p> <p>The wording of paragraph 5.6 has been amended slightly for clarity.</p>
6	<p>Build costs - Whilst BCIS is a helpful indicator for more straight forward projects, given the source and general scarcity of the data, it is not reliable for larger multi-phased projects. BGY Regeneration Limited believe wherever possible such assessments should be</p>	<p>The SPD does state that "In most cases it is likely to be more appropriate to rely on a specific assessment of build costs ('Cost Plans')." However, the Council still considers it appropriate that these costs are benchmarked against BCIS or Spon's information.</p>

	<p>benchmarked against other similar projects however benchmarking against BCIS or Spon's is only appropriate for smaller more straight forward projects and would not be appropriate for developments such as The Goodsyard.</p>	
7	<p>In regards to abnormal development costs, whilst it is accepted that some abnormal costs are likely to result in a lower land value that could be achieved on a site, the SPD does not recognise that not all abnormal costs are known by the Applicant until the land has been purchased and detailed site investigations have been carried out. Furthermore, the land value, as stated in the NPPF, should still provide a competitive return to the landowner in order to bring forward the site for development and this should be taken into consideration when considering abnormal costs and site value together. Where abnormal costs take the land value below the landowner's reasonable expectation, it may only be flexibility that is permissible in planning gain contributions, that ultimately allows the site to be delivered.</p>	<p>The Council considers the wording of the SPD to be appropriate in respect of the impact of abnormal costs on land value. The terminology used in the SPD is not absolute in terms of abnormal costs needing to be borne by land values.</p>
8	<p>BGY Regeneration Limited disagree with the statement in the SPD that marketing costs for larger developments, economies of scale are expected to occur, resulting in proportionally lower costs. Large developments involve significantly greater levels of marketing in order to meet the off-plan sales target imposed by funders such as banks to release developer funding. This can involve overseas marketing, marketing suites and greater levels of advertising so that the development stands out from the many other developments being marketed over a long-period of time, which is the case for Canary Wharf and the Isle of Dogs at present with a significant amount of units being sold. For multi-phased schemes, such as The Goodsyard, that require constant marketing over a period of time and also the refurbishment of marketing suites that could, for some large schemes, be 3 or 4 years old this all results in significantly higher marketing costs which are generally above the market average for large multi phased schemes.</p>	<p>Noted. Whilst the Council considers economies of scale in terms of marketing costs will apply in many instances, the SPD has been re-worded so that it reflects that this may not be the case in every instance.</p>

<p>9</p>	<p>Developer's profit - The level of profit allowed should not be adjusted so that the scheme becomes viable when providing the proposed level of planning obligations. Profit is related to a range of variables including mix, scale and geographical location and is derived from the market and the prevailing conditions. Profit cannot arbitrarily be fixed at a certain level simply to manufacture a particular outcome.</p>	<p>The requirement in paragraph 5.6 of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit.</p> <p>The wording of paragraph 5.6 has been amended slightly for clarity.</p>
<p>10</p>	<p>Benchmark land value - The one size fits all approach to land values does not reflect the unique nature of development sites and the SPD seems to acknowledge this by recognising a number of ways of establishing an appropriate BLV. The SPD recognises that the CUV+ to viability is the preferred approach. However, it is the 'plus' in the equation that is relevant and should reflect the particular characteristics of the site and therefore a premium above 20% could be exceeded depending upon the characteristics of the site.</p> <p>As an example, a site with an existing tenanted office building with good rents may yield a reasonable CUV and with limited scope for a greater amount of space on the site, the uplift from CUV required to release the site may be very limited. Conversely, a cleared site or one with low-density and low-grade industrial uses, with an allocation for mixed use development, perhaps increasing site coverage multiple times, will not likely be released with a premium above CUV of 20% to 30% and it is highly probable that the release value will be a multiple of CUV rather than a margin above.</p> <p>Landowners in this latter scenario will feel entitled to a reasonable return for their asset. In the case of the office building it may be that land value represents, say 30% of GDV whereas in the case of the low-density industrial building, the land value may be no more than 10%. Valuers should use their professional judgement to assess the value of land for planning viability purposes, ensuring that there is a reasonable split between land value, development profit and</p>	<p>The SPD describes that in most cases the Benchmark Land Value will be assessed with reference to existing use value. The Council considers this is consistent with emerging and adopted guidance from the Mayor of London.</p> <p>The Council acknowledges the issue highlighted in establishing an appropriate level of premium. In the Council's experience a premium of 20% is most commonly applied hence the SPDs reference to this level of premium generally.</p>

	<p>planning obligations / CIL.</p> <p>BGY Regeneration Limited are very supportive that Market Value is acknowledged in the SPD due to the fact that The Goodsyards which has a low CUV, but with an allocation for a mixed use development wouldn't come forward if assessing the BLV on a CUV or AUV basis as this wouldn't reflect a premium to the landowner and in this case Market Value, reflecting policy requirements, would be the most appropriate BLV.</p>	
11	<p>Viability Reviews - Timings - The SPD recognises that review mechanisms can contribute to additional planning gain based on future market improvements. Reviews have been incorporated on longer-term schemes, the RICS suggest a five-year development programme might be appropriate or where there are multiple phases. The SPD should seek to avoid the use of reviews on shorter term projects, unless exceptional circumstances exist, as reviews on smaller projects decrease the prospects of funding opportunities and ultimately, deliverability. The time taken to negotiate reviews, particularly on smaller schemes, can also be disproportionate.</p> <p>Reviews can also be time consuming in terms of their collation and their execution. In a single-phase scheme with a development programme of say two to three years, the potential for significant upside is relatively limited.</p> <p>The period of 24 months for the pre-implementation review should not be fixed and should be considered on a site by site basis. Clearly for large strategic sites such as The Goodsyard a longer period is required to reach substantial implementation than for a smaller, less complex site. This should form part of the S106 negotiations.</p>	<p>The SPDs approach to Viability Reviews is consistent with the draft Mayor of London's Affordable Housing and Viability SPG.</p> <p>The Council will work with applicants/developers in respect of review mechanisms drafted in specific S106 agreements but consider it important to set out a framework in the SPD for the basis of the formation of these parts of the agreements.</p> <p>In order to mitigate the potential issue of it taking a disproportionate amount of time to agree the scope of viability reviews, the Council will, in due course, undertake further work to standardise the approach to viability review mechanisms.</p>
12	<p>Viability review process - The SPD doesn't recognise that the Site</p>	<p>The Council's approach to Viability reviews is consistent with the draft Mayor of</p>

	Value forms part of the viability review and clearly should a review take place 2 or 3 years from the date of the signing of the S106 there needs to be an up to date assessment of the Site Value to make sure that it is still providing a competitive return to the landowner so that the site would still come forward. Therefore, this is not consistent with the NPPF's reference to a reasonable return to a landowner.	London's Affordable Housing and Viability SPG.
13	Pre-Implementation - BGY Regeneration Limited accepts the principle of a pre-implementation review. It does not, however agree with the reference to a further review if development stalls for a further period of 12 months after substantial implication. Factors outside of the Applicant's controls could result in the developer stalling and clearly the implications of a further review would further stall the development.	The Council does not agree that a further review would necessarily further stall a development if carried out in a timely and collaborative manner.
14	Mid-term reviews - The SPD states that where build costs were based on BCIS in the applications stage assessment, these will be index linked from the date of the previous review. BGY Regeneration Limited believe any costs should be based upon actual costs if known and not indexed. As well as with regard to whether	In some cases it may be appropriate to base build costs on BCIS information. Where this is the case any related review mechanism should reflect the same basis as the original assessment. Where original viability submissions are based on specific costs plans the Council acknowledges that any related review mechanism should reflect the same basis as the original assessment.
15	Advanced stage reviews - BGY Regeneration Limited would highlight the implications of imposing a viability review once the sale of 75% of residential units have been achieved. The main risk is in regards to securing funding due to the risk that an advanced stage review would cause to the developer. Banks would be reluctant to provide funding if there is a risk that an unforeseen payment could be made at the end of the project and therefore it is likely that the bank would provide funding on the worst case i.e.. the affordable housing contribution cap is payable. This is likely to result in more onerous conditions on the developer.	Potential implications are noted. The Council's proposal regarding advanced stage reviews is consistent with the requirements described in the Mayor of London's draft Affordable Housing and Viability SPG.

16	<p>Formula 1 - BGY Regeneration Limited would question why any surplus determined as a result of the viability review is split 60/40 in favour of the Council. The developer takes all of the risk in delivering the project whilst any surplus as an outcome of the developer striving to improve the schemes performance of the scheme is weighted in favour of the Council. If anything, the split should be on an equal 50/50 split if not in favour of the developer.</p>	<p>The split described in the SPD is consistent with the split described in the Mayor of London's draft Affordable Housing and Viability SPG.</p>
17	<p>Formula 2 - The formula should be calculated on the scheme specific details such as affordable rent floorspace and intermediate floorspace, if known. Affordable rent and intermediate values should be based upon the scheme specifics rather than London average.</p>	<p>The Council considers it appropriate for formula 2 to seek additional onsite floorspace to be delivered in accordance with the tenure mix requirements as described in the Council's Local Plan.</p> <p>Noted with regard to affordable rent and intermediate values being based on scheme specifics rather than the London average. Wording in the SPD has been amended to reflect this.</p>
18	<p>DVSPD06 - Berkeley Group</p>	
19	<p>Pre Application Advice - It is understood that in order to verify whether a proposed affordable housing offer is the 'maximum reasonable', the Council will require a viability assessment early in the determination process; however, given the complexity and evolving nature of viability assessments we consider that they should be submitted only when key aspects of the application have been firmly agreed. Seeking viability assessments at the pre application stage, even if in draft, and requiring them as part of validation will cause significant delay to the application and development process. A solution could be to include details of when and how the viability assessment should be submitted in the planning performance agreements that accompany major applications. This would set clear deadlines for the applicant and also provide clarity for when the council should appoint an independent assessor.</p>	<p>The Supplementary Planning Document (SPD) aims to encourage early submission of viability information to lessen the likelihood of viability discussions causing delays in decision-making. It does not require the submission of viability information at the pre-application stage.</p> <p>Paragraph 4.6 of the SPD acknowledges that the levels of detail that can be provided will vary from scheme to scheme so the Council does not consider any change to the document is necessary.</p> <p>The Council does not agree that requiring the submission of viability assessments at the application stage will cause significant delay – this is a longstanding requirement of the Council who have found this has been key to preventing delays in the decision-making process.</p>
20	<p>Planning Applications - The specific reference to the Mayor's 'Threshold Approach' in KR2 is supported and on this basis we</p>	<p>Noted. The SPD has been amended to clarify that where housing policy is met that a viability assessment will not be required to be submitted.</p>

	<p>consider that the SPD should make it clear that, where affordable housing policy is met it will not be appropriate to request a viability assessment.</p> <p>Commuted sum payments for off-site affordable housing should contribute towards the 35% provision. This would provide flexibility for the developer and the Council in delivering and maximising the provision of affordable homes from new development.</p>	<p>The Council's adopted Managing Development Document describes that off-site affordable housing (which can be delivered using payments in lieu) will only be considered where the scheme can provide 50% affordable housing overall. Therefore commuted sums should contribute to affordable housing policy requirements overall as opposed to specifically 35% provision – the Council considers that the SPD already makes this clear.</p>
21	<p>With regards to Section 73 applications, it would be useful to clarify whether it is the Council's intention that this could result in a reduction in affordable housing where viability has worsened since the original permission. It is often the case that amendments to developments are sought in order to amend the mix, for example to provide homes suited to the market at that stage and for developments to remain viable. In these circumstances reductions in affordable housing should also be considered. Any viability review of a S73 application should only be applied to the uplifted quantum rather than the whole development.</p>	<p>It is the Council's position that a reduction in the provision of affordable housing could not usually be considered a minor material amendment and therefore be addressed under a S. 73 application.</p>
22	<p>The details of a major application will evolve and can change considerably as an application is taken through the planning application process. These changes will impact on viability. Rather than submit and publish different iterations of an assessment, from the validation stage (which would be time consuming and costly and not aid public understanding of the assessment), assessments are more appropriately submitted and published when they are agreed. To aid community understanding it might be preferable to publish a summary of the assessment and the independent assessor's review of it. On this basis, the requirement for an applicant to submit a full FVA, Executive Summary and Appraisal Inputs Summary Sheet to ensure validation is considered unhelpful and overly onerous.</p> <p>It is important to ensure that local lists and validation requirements meet Government policy to be proportionate to the nature and scale</p>	<p>The Information Requirements described in the SPD are to encourage and assist with public participation through the course of a planning application. The Council considers that amending the SPD in accordance with the comment will harm public participation so the Council is not proposing to change the SPD in this regard.</p>

	<p>of development (NPPF, para 193). Given the risk of the validation process to delay the consideration of applications it is important that requirements reflect the nature of the planning process, particularly in areas which are typically subject to negotiation following submission such as planning obligations. This is recognised in Planning Practice Guidance which advises against requirements for too great a level of detail on these matters on local lists.</p> <p>On this basis, requiring and a full viability assessment as a validation requirement would be not only impractical, but also unhelpful as they would contain untested assumptions about the borough's and other consultees requirements which could cause uncertainty and confusion with consultees. The proposed requirement will in practice slow down validation and consideration of applications without achieving the LBTH's aims of greater transparency for members and the public. Furthermore, continued reassessment will prove a significant drain on valuable Council resource.</p>	
23	<p>Where the borough or its independent experts do not agree with key appraisal assumptions including costs and values this should be supported by justification and evidence of why they do not support the inputs.</p> <p>In terms of submitting editable electronic/software models, this is already the case; however, any alterations made to the model assumptions by the Council should be made clear to the applicant and justification for such changes should be set out by the Council.</p>	Noted. The SPD has been amended to ensure the need for conclusions in Council instructed reviews to be backed up by evidence.
24	<p>Whilst it is encouraged to see that the Council propose a different process for 'Build to Rent' schemes, it would be useful at this stage if the Council provided further clarity at this stage regarding the likely process.</p>	The Council will be considering a process in more detail in due course and in particular when the results of the Government's <i>Planning and affordable housing for Build to Rent</i> Consultation that is to close on May 1 st 2017.
25	Transparency and Deliverability - We support the need for	Noted.

	<p>greater transparency in the viability process, however, given the complex and sensitive nature of viability appraisals, it is important that this is addressed at the right time and that the most sensitive information remains confidential.</p>	
<p>26</p>	<p>Many assessments include information which is commercially sensitive. For example, this could include allowance for acquisition of third party land, rights of light, vacant possession compensation costs or other information that would severely compromise the applicant's commercial position. In line with previous FOI decisions (which recognises that some information is commercially sensitive and there should not be blanket disclosure), the SPD does suggest that if an element of a viability assessment would cause harm to the public interest the Council 'may' allow for exceptions in 'limited circumstances'. Whilst this is acknowledged, it is considered that a more flexible approach should be adopted when there are elements of commercially sensitive information within the FVA which the applicant considers should not be disclosed and it should be for the applicant to provide reasoned justification on why it should be redacted.</p>	<p>The Council's transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. The Council does not consider that changes to the proposed SPD are required in this regard.</p>
<p>27</p>	<p>We agree that it would be helpful to provide a non-technical executive summary of the viability assessment explaining the key factors and conclusions. This should be prepared at the time when the assessment is agreed so that the inputs are settled and conclusions agreed. Earlier publication 'as soon as practicable following validation' as currently proposed in the SPD, could complicate matters, for example the public will not understand why the assessment has changed through the course of the application, it too would be a drain on valuable resources, not least officer's time as members of the public query elements of the assessment. To aid community understanding it might be preferable to publish a summary of the assessment and the independent assessor's review of it.</p>	<p>The Information Requirements described in the SPD are to encourage and assist with public participation through the course of a planning application. The Council considers it key that an executive summary be submitted as a validation requirement to enable effective public participation.</p>

28	<p>Key Requirement 11 in the draft SPD states that '<i>FVAs cannot demonstrate that schemes as proposed are technically unviable</i>'; this is somewhat ambiguous. It is often the case that the viability assessment will show a deficit but the applicant will proceed with the development as they expect the market and values to improve over time. It is for the developer to take into account the level of risk which is assessed and presumed with the FVA demonstrating what the developer considers a viable position. In certain cases, this could (for example) result in a reduced infrastructure delivery. It is therefore considered that the SPD should not preclude the ability of applicants to do this. Where there is a deficit, the review should take effect from the deficit position. In these circumstances the council could require the applicant to set out their growth assumptions to justify their decision to proceed with a deficit.</p>	<p>This matter is described in more detail under the 'Deliverability' heading in section 5.</p> <p>The Council is not supportive of viability assessments demonstrating significant deficits as this raises questions regarding the commercial basis of the proposed scheme and the terms under which development finance is likely to be secured.</p> <p>Where a scheme would otherwise have demonstrated a deficit, the viability assessment should account for growth projections and/or the deficit should be demonstrated in terms of the impact on the current day profit of the scheme. A change to wording of paragraph 5.6 of the SPD has been made to clarify this point.</p>
29	<p>Methodology - Where high values and strong market growth have been seen in recent years up to the Referendum (June 2016), the significant investment developers make and the high risks undertaken can often be overlooked. Indications of market slow down needs to be considered, if increased housing delivery and regeneration is to continue. On this basis, the SPD should relate level of profit to risk levels.</p>	<p>The Council considers paragraph 6.24 (of the second consultation version) of the SPD already relates profit to risk levels.</p>
30	<p>Given the challenging market conditions and the abnormal costs associated with bringing former gasworks sites forward as well as other site constraints, we do not anticipate that this is likely to improve viability prospects compared to when this was considered for the 2013 MDDPD or the Council's CIL Examination.</p> <p>The Council should not be seeking to place additional burdens on sites. The draft SPD proposal to simply adjust the level of profit where a scheme is identified as unviable amplifies the need for the Council to adequately test the viability of policy and site allocations in the emerging Local Plan. Furthermore,</p>	<p>The requirement of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit.</p>

31	<p>We disagree that 60% of surplus profit should be paid to the Council. As outlines above, development is a high risk business and we consider that there is no justification for a 60:40 split in favour of the Council.</p>	<p>The split described in the SPD is consistent with the split described in the Mayor of London's draft Affordable Housing and Viability SPG.</p>
32	<p>Benchmark Land Values (BLVs) - Land will not be released at existing use value; a reasonable premium will be expected from landowners to justify and incentivise sale. If there is a reasonable prospect of land securing planning permission for an alternative, higher value use, the land owner will expect this to be reflected in the land value. On this basis we accept the proposed Key Requirement 19; however, there should be no cap on the level of premium as this would not allow the expectations of paragraph 173 of the NPPF to be met.</p> <p>We acknowledge Key Requirement 19 and the Mayor's preference for a EUV 'plus' premium approach when determining land value. When using this approach we consider market evidence should be used to advise on the extent (%) of the premium as recommended in paragraph 23 of the PPG. This allows for a 'sanity check' of the EUV particularly where land value is calculated to be much lower than recent transactions in the local area. This also meets the requirements of the NPPF by recognising the need for a competitive return for the land owner.</p>	<p>In the Council's experience a premium of 20% is most commonly applied in the borough hence the SPDs reference to this level of premium generally.</p> <p>There is limited value in using market evidence as a 'sanity check' as the development plan advocates the existing use value plus approach. However, if applicants would like to submit this information they are able to. The Appraisal Input Summary Sheet requires the provision of Land Acquisition Costs information against which comparison against the Benchmark Land Value can occur.</p>
33	<p>We welcome a realistic alternative scheme may be used to form a BLV; An AUV helps to provide more context in terms of what is an appropriate land value and is very relevant to a land owner in seeking the highest sale price. Given the mixed use nature of London it is appropriate to accept alternative use values and this should not be restricted to where there is an existing planning permission as currently proposed by the draft SPD. It is possible to promote an AUV without obtaining a planning consent (permitted development rights etc). Having to obtain a separate planning permission will potentially delay development coming forward and</p>	<p>The Council has reconsidered its position with regard to when it will accept an Alternative Use Value as a Benchmark Land Value. It is not necessarily the case that a planning permission for the alternative use must be in place (however this is preferred), however the application of a particular alternative use will need to meet a number of criteria, such as:</p> <ul style="list-style-type: none"> • The alternative use would be policy compliant and would secure permission; • There would be no additional costs or delay in securing that permission – or those additional costs and delays are assessed; • The <i>detailed</i> alternative proposal is required to be worked up to an

	accrue unnecessary fees particularly where there is a very strong likelihood that the promoted use would secure permission.	<p>equivalent level of detail as the proposed housing-led scheme, incorporating realistic current day costs and values;</p> <ul style="list-style-type: none"> • There is a real world demand for the alternative at the values assumed; • In the real world the landowner would really develop out the alternative rather than use it as a negotiating lever to force down affordable housing.
34	Viability reviews - The SPD proposal to trigger a Pre Implementation Review if substantial implementation occurs after 24 months raises some issues. The definition of 'substantial implementation' can vary and time taken to reach this point can be frustrated by the number and details of pre commencement conditions linked to a permission and the extent of site remediation required. In light of this, the Council should not over impose the number of pre-commencement conditions and must ensure that any planning condition discharge applications are dealt with in a timely manner.	Noted. The Council will always seek to ensure the discharge of any planning conditions are dealt with in a timely manner.
35	<p>Advance Stage Reviews as proposed (on sale of 75% of market homes) should only be included in exceptional circumstances and the SPD should be amended to reflect this. Where there are reviews the proposed 'cap' (as set out in paragraph 7.9) of the SPD, should be at the average level of affordable housing that has been achieved locally over a five year period.</p> <p>Typically on longer term developments developers have to invest significant sums at an early stage for site preparation and any provision of early infrastructure as well as CIL payments. The inclusion of review mechanisms is likely to increase the cost of capital as it is seen as an increased risk by funders. Therefore, any review must take full account of cost increases, start at the position that the development is not in deficit, and be capped at the outset at the level of affordable housing policy compliance so that the full risk is known to the applicant and their funders.</p>	<p>The Council's proposal regarding advanced stage reviews is consistent with the requirements described in the Mayor of London's draft Affordable Housing and Viability SPG.</p> <p>The Council does not agree that the proposed 'cap' in reviews should reflect affordable housing levels achieved locally over a 5 year period, the Council is firmly of the position that that the cap should be reflective of affordable housing levels described in the Development Plan.</p> <p>The Council disagrees that any review should start at a position that the development is in deficit. The Council has set out measures in the SPD to ensure applications are deliverable. Where schemes are below policy compliant levels, and where additional value has been identified via a review mechanism it is appropriate, in a plan led system, for additional value identified in respect of an already deliverable project to reasonably contribute to achieving the objectives of the Local Plan.</p>
36	If an advance review indicates a further requirement for affordable	The Council considers it is better to establish whether any surplus identified in

	homes, the SPD needs to make it clear that this is likely to be in the form of a commuted sum payment towards off-site provision given that the development will be close to completion and accommodating further affordable housing on site would be complex and add further costs.	advanced stage review mechanisms should be provided via on-site delivery or via a commuted sum payment on a case by case basis, taking account of the circumstances of the specific scheme.
37	DVSPD04 - Rolfe Judd Planning on behalf of various clients	
38	We urge the Council to confirm that the threshold approach to viability will be adopted in accordance with the process set out in the Mayor of London's draft Affordable Housing and Viability SPG. It is vitally important that there is consistency between strategic and local levels on this issue.	Noted. The SPD confirms that the Council currently intends to adopt the threshold approach. The Council is working closely with the Greater London Authority to ensure consistency in this regard and with respect to the SPD as a whole.
39	Whilst we note the Council's preference that a draft financial viability be submitted to the Council for review at the pre-application stage, this will not always be possible or practicable, particular given that the scheme may not be fixed until close to the submission of the application. Furthermore, we are acutely aware that the Council's own external viability consultants do not always respond quickly to submitted viability information. To be effective and to ensure there is no delay in the submission of planning applications, we would recommend an alternative approach, where information on key assumptions (i.e. EUV/AUV, build costs, abnormals (if known, anticipated values etc) is submitted for agreement at the pre-application stage. This will ensure key principles are agreed, thus limiting potential delays when the viability assessment is submitted as part of the final planning application.	The SPD aims to encourage early submission of viability information to lessen the likelihood of viability discussions causing delays in decision-making. It does not require the submission of viability information at the pre-application stage.
40	Para.4.7 – the Council should clearly define what constitutes a 'change in economic circumstances of the scheme'	Noted. The Council has amended the wording of paragraph 4.7 to provide more clarity in this regard.
41	Para 4.13 – It is not clear why the Council is requesting a fully working software model. This implies that the Council is intending to manipulate or scenario test any viability assessment submitted. However, in our view, the Council should only be considering whether	The Council considers it is the role of the Council and its consultants to: <ul style="list-style-type: none"> • Interrogate proposals in detail; • Carry out sensitivity testing to identify alternative affordable housing mixes the Council considers may be viable, to assist with discussions.

	the various assumptions/inputs are considered acceptable/appropriate, it is not the role of the Council to alter the applicant's business/commercial model underpinning the viability assessment.	These matters can be more efficiently addressed with a fully working software model.
42	Para 4.14 – we urge the Council to identify (within the SPG) the anticipated costs likely to be incurred in either the Council or appropriated assessor reviewing any viability assessment. Furthermore, the requirement for a solicitors undertaking is considered to be excessive (and adding additional cost to the process). In our view, the inclusion of an agreement to pay any costs can reasonably be set out within a PPA	<p>It will not be possible for the Council to describe anticipated costs in the SPD as these could vary significantly on a case-by-case basis. The Council has procurement protocols in place to ensure the costs incurred are reasonable.</p> <p>Paragraph 4.14 of the SPD describes that an undertaking to pay costs incurred may also be expressed in a Planning Performance Agreement. A Solicitor's undertaking is important because it is not the case that a Planning Performance Agreement will be agreed in respect of every application.</p>
43	<p>Section 5 (Transparency) – whilst we acknowledge the need for greater transparency in producing/assessing financial viability assessment, this is a particularly sensitive area. As per the London Mayor's draft Affordable Housing and Viability SPG, we would recommend the Council adopt the threshold approach towards the submission of viability information. We would also remind the Council that sensitive commercial information will always be included within a viability assessment and it is important that this information remains confidential. Regulation 12(5)(e) of the Environmental Information Regulations 2004 provides that a public authority may refuse to disclose information to the extent that its disclosure would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest. According to the Information Tribunal in Bristol City Council v Information Commissioner and Portland and Brunswick Squares Association (EA/2010/0012, 24 May 2010)², the construction of the exception can effectively be read as imposing a four-stage test. All four of the following conditions must be met for the exception to be engaged:</p> <ul style="list-style-type: none"> • The information is commercial or industrial in nature. • Confidentiality is provided by law. This will include confidentiality 	The Council has sought substantial advice on the matter of disclosure and transparency and, in the context of this, the need to encourage community involvement and the agenda of transparency of the current administration, it is confident the approach proposed is appropriate.

	<p>imposed on any person by the common law of confidence, contractual obligation, or statute.</p> <ul style="list-style-type: none"> • The confidentiality is protecting a legitimate economic interest. Where the arguments refer to the economic interests of a third party, it will not be sufficient for a public authority to speculate on the potential harm attached to disclosure. Instead, the public authority must have evidence that demonstrates the arguments genuinely reflect the concerns of the third party. • The confidentiality would be adversely affected by disclosure. It should be noted that, the Information Tribunal in the aforementioned Bristol City Council case considered that the disclosure of truly confidential information into the public domain would invariably harm the confidential nature of that information. As such, if the preceding three stages of the test are fulfilled, it will follow that the exception is engaged. Where this is found to be the case, a public authority must next go on to assess whether the balance of the public interest required disclosure. 	
<p>44</p>	<p>Para 5.10 – We do not consider the Council’s requirement that evidence be provided from an experienced developer that a development scheme is viable to be appropriate. The Council (and appointed viability assessor) should be able to form a professional view on the likely deliverability of any development based on the evidence base submitted in support of the proposed development (and its relation to comparable schemes in the area). Seeking views from a developer is likely to result in a significant conflict of interest (with a developer able to choose whether to support or not any viability information). Added to this, developers often operate under very different business models, which are not directly transferrable to one another. Ultimately, there is no benefit to a landowner spending a significant amount of money in preparing/submitting a planning application for a development proposal is not deliverable.</p>	<p>The Council considers it important that assurances are provided regarding deliverability. The Council has received applications where it has subsequently been the case that there was limited intention to deliver the application in question.</p>
<p>45</p>	<p>Para 5.12(2) – we note that the list of inputs to be included within a development viability assessment has omitted CIL;</p>	<p>For the purpose of this paragraph, CIL is defined as a ‘Planning Contribution’.</p>

46	Para 6.30 – The SPG should also acknowledge that Alternative Use Value may also be established via changes which could appropriately be made under permitted development	Noted. The SPD has been amended in a way that can ensure permitted development rights can be accounted for in alternative use value benchmark land values.
47	Section 7 (Viability Reviews) – we have a number of comments in relation to this section:	
48	<ul style="list-style-type: none"> Viability Reviews should not be required on schemes which commit to the provision of 35% of accommodation as affordable; 	The Council disagrees with this point. This is not consistent with the current provisions of neither the 'Threshold Approach' nor the Council's Local Plan affordable housing policy.
49	<ul style="list-style-type: none"> Where a viability review is required (due to an under provision relative to policy), the requirement to provide any additional affordable housing (either on-site or by way of a payment in lieu) should only come into force once any identified deficit (or reduction in developer profit below 20%) has first been recovered by the developer; 	The Council disagrees with this point. The Council has set out measures in the SPD to ensure applications are deliverable. Where schemes are below policy compliant levels, and where additional value has been identified via a review mechanism it is appropriate, in a plan led system, for additional value identified in respect of an already deliverable project to reasonably contribute to achieving the objectives of the Local Plan.
50	<ul style="list-style-type: none"> Where a viability review has been undertaken and identified an increase in GDV has been identified, the proportion of surplus GDV to be provided towards additional affordable housing should not exceed a 50:50 between the Council and developer. Given that the Council do not share the developer's risk, it is unreasonable to skew the split in favour of the Council. Such an approach will discourage funding partners and will not encourage a developer to increase scheme revenue post grant of consent; 	The split described in the SPD is consistent with the split described in the Mayor of London's draft Affordable Housing and Viability SPG.
51	<ul style="list-style-type: none"> Where a viability review has been undertaken and identified an increase in GDV has been identified, the provision of additional affordable housing (either on-site or by way of a payment in lieu) should be capped at a policy compliant provision (i.e. where the consented development with any additional affordable housing reaches a 35% provision); 	The Council agrees that additional affordable housing provision identified via a review mechanism should be the subject of a policy cap and this is accounted for in the formulas described in the SPD.
52	<ul style="list-style-type: none"> Any payment in lieu received by the Council (following a viability 	The Council does not agree with this approach. For larger schemes it can take

	review) should ring-fenced towards the delivery of affordable housing within the Borough. Where that payment is not spent within 5 years from the grant of planning permission, it is reasonable for the Council to repay the money (if requested by the developer);	longer than 5 years from the grant of planning permission to the payment of in-lieu contributions.
53	<ul style="list-style-type: none"> We would also urge the Council to publish records of where money (received from the above process) is spent within the Borough and those projects benefiting (including the number of affordable units delivered). 	The Council will consider this proposal moving forward but does not consider it appropriate that this process should be set out in the SPD.
54	<ul style="list-style-type: none"> Mid-term viability reviews should only be undertaken on significant development proposals, where a proportion of the development in outline only and a deliverable level of affordable housing have not been identified beyond the first phase. 	Noted. The Council considers the current provisions of the SPD are appropriate in this regard.
55	<ul style="list-style-type: none"> Where detailed schemes have been consented (based on a defined tenure and housing mix), it will not often be possible to provide additional affordable housing on-site (post implementation) without making significant changes to the approved scheme. In such cases, any additional affordable housing to be provided should be via a payment in lieu. The Council should also give consideration to whether a commercial agreement is already in place with an RSL – which again may preclude the provision of additional affordable housing. 	The Council considers the SPD is appropriate in this regard and considers that it is better to establish whether any surplus identified in post implementation review mechanisms should be provided via on-site delivery or via a commuted sum payment on a case by case basis, taking account of the circumstances of the specific scheme.
56	DVSPD12 - Metropolis Planning and Design	
57	<p>The London Plan policy refers to ‘phased development’ and ‘pre-implementation reviews’ and there is no development plan policy for post implementation review on single phase schemes.</p> <p>All references to ‘advanced stage review’ must therefore be deleted from the SPG as they are contrary to policy, will carry no weight, and will be mis-leading.</p>	<p>Noted regarding the wording of the London Plan.</p> <p>Policy 3.12 of the London Plan states “The maximum reasonable amount of affordable housing should be sought...”. The Council considers its approach to review mechanisms is a way of complying with this policy.</p> <p>The Greater London Authority also considers that the approaches to reviews</p>

		set out are consistent with the Development Plan and the SPD's approach to Viability Reviews is consistent with the draft Mayor of London's Affordable Housing and Viability SPG.
58	DVSPD10 - CMA Planning on behalf of various clients	
59	We consider that some context should be provided on actual affordable housing delivery in the borough. It is understood that one of the aims of the SPD is to support Local Plan policies that seek to maximise the delivery of affordable housing; however, when providing a narrative on the need for affordable housing in the borough, a fundamental element of this narrative is how much affordable housing has historically been delivered, and we consider that a summary of the affordable housing delivery figures in recent years should be provided in this section of the SPD.	This is the purpose of the Council's Annual Monitoring Report which can be found on the Council's website.
60	At KR6 we would seek for the text to be amended as follows (our proposed new text is shown as underlined – no existing text is to be deleted): <i>"Revised appraisals (with revised Executive Summary and the Appraisal Inputs Summary Sheet) should be submitted to the Council prior to determination where the financial viability assessment changes <u>significantly</u> throughout the planning application process."</i>	The Council disagrees with the addition of the word 'significantly'. It is difficult to quantify the meaning of this term. The Council will of course be pragmatic in the application of this approach.
61	We consider that KR22 should be deleted as it duplicates the provisions of KR20.	Noted. Change will be made.
62	At KR27 and within the formulae set out in Appendix B we query how the 60% figure has been arrived at. The proportion of surplus profit to be paid to the Council following a viability review must be evidence based and that evidence should be provided, or at the very least be referenced (where the information is publicly available) within the SPD.	The split described in the SPD is consistent with the split described in the Mayor of London's draft Affordable Housing and Viability SPG.
63	Process - We strongly disagree with the proposed approach set out	The provisions of paragraph 4.1 are consistent with the approach described in

	<p>in the first bullet point at paragraph 4.1, which should be deleted. The 35% threshold represents a discreet figure in terms of the proportion of habitable rooms that are to be provided as affordable housing within a given development proposal. We have serious concerns that introducing a requirement for the 35% threshold to take into account local residential mix and tenure split policies would muddy the water and provide less, not more, clarity on whether the threshold has been met, and thus whether an application would be validated without being accompanied by a financial viability appraisal (FVA).</p>	<p>the Mayor of London's draft Affordable Housing and Viability SPG. The Council considers it is absolutely appropriate to take account of local residential mix and tenure split policies as part of the Threshold Approach.</p>
64	<p>At paragraph 4.7 we consider that greater clarity is needed on the point at which it would be considered that a S73 minor material amendment "<i>alters the economic circumstances of the scheme</i>". Technically, almost all S73 minor material amendments that include physical alterations to the scheme (including changing the cladding material or fenestration details) would result in a change in built cost and thus alter the economic circumstances of a scheme, albeit in a limited manner for the afore mentioned examples.</p> <p>If economic circumstances are to be considered in this manner, then a threshold approach should be applied and this paragraph should be explicit on the point at which a FVA would be required (for example, for S73 amendments resulting in an increase in floorspace of over 100sqm). We would also advise that the threshold would need to be evidence based and justified.</p>	<p>Noted. The Council is proposing an amendment to clarify where an FVA is required to be submitted with a S. 73 application. However, it is difficult to establish wording that will cover all circumstances and individual applications should be considered on a case-by-case basis.</p>
65	<p>The submission of FVAs to demonstrate optimum viable use is rare and the appraisals are often complex. Requiring an FVA for any proposals resulting in less than substantial harm to the significance of a designated heritage asset, which could include proposals for very minor internal alterations to a listed building, would place an unreasonable burden on most applicants through the requirement to commission a costly appraisal and cover the costs of the Council's review of said appraisal for minor works which could be policy compliant, despite not demonstrating that the optimum viable use</p>	<p>Noted.</p> <p>The Council would like to maintain a reference to the submission of a viability assessment to demonstrate that the proposal is securing the heritage asset's optimum viable use, but has amended the wording to make it clear that this may not apply in all instances.</p>

	<p>would be secured.</p> <p>Whilst securing the optimum viable use of a designated heritage asset constitutes a public benefit (with reference to paragraph 134 of the NPPF), it is but one of a wide range of public benefits that could be brought by a development proposal. As such, in cases where paragraph 134 of the NPPF is relevant the Council can still carry out its statutory duty under Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, and a proposal can still meet the policy tests at paragraph 134 of the NPPF and within the Council's Local Plan, despite an application failing to demonstrate that the optimum viable use has been secured. On this basis, we consider that paragraph 4.8 should be deleted. However, if you were to retain text on FVAs relating to optimum viable use, we would suggest that this text be provided under its own heading and it should be made clear that it is not a policy or validation requirement, but rather guidance on how such FVAs should be prepared in the event that an applicant wished to demonstrate that they would be securing the optimum viable use of a designated heritage asset. Such FVAs are complex as they require multiple development scenarios to be detailed, costed and appraised so as to determine which scenario causes the least harm to the significance of the designated heritage asset whilst remaining financially viable. If retained, this section of the SPD should therefore set out in detail the Council's technical requirements for such FVAs.</p>	
66	<p>At paragraph 4.9 we consider that the reference to the failure to submit a FVA in the event of paragraphs 4.7 and 4.8 being triggered likely resulting in the application failing to meet validation requirements is unacceptably inflexible and should be omitted. As set out above, whilst we do not object to the principle of FVAs being required for S73 minor material amendments, greater clarity is required on the point at which an amendment is considered to alter the economic circumstances of a scheme before this could be appropriately enforced as a validation requirement. In addition, as the optimum viable use test is not a policy requirement, and as</p>	<p>The Council does not agree. It is important that Viability Assessments are submitted where required by planning policy. The Council will be pragmatic in terms of the extent of information it requires and will be decisions in this regard on a case-by-case basis.</p>

	consideration of the degree of harm cause to a heritage asset it subjective, together with other reasons set out above, we consider that FVAs cannot be a validation requirement for applications relating to designated heritage assets.	
67	At paragraph 4.14 and KR4 we object to the requirement for the submission of an undertaking to cover the Council's costs of reviewing the FVA before an application can be validated, which is unreasonable and should be deleted.	The Council does not agree. It is important that the Council is able to cover its cost of considering viability submissions.
68	Methodology - At paragraph 6.26 and KR15 we object to the stipulation that profit levels should be adjusted in the event that schemes are identified as unviable at the proposed level of planning obligations. We consider it would be both unreasonable and contrary to Paragraph 173 of the NPPF to require a reduction in developer's profit in the event that a scheme was identified as being unviable at the proposed level of planning obligations. In such an event, the NPPF is clear that the level of planning obligations should be adjusted to ensure a 'competitive return' to a willing landowner and a willing developer. As such, we consider that paragraph 6.29 and KR15 should be deleted.	Noted. The requirement in paragraph 5.6 of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme's profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit. This requirement is not intending to replace the need for the adjustment of planning obligations as described by the NPPF. The wording of paragraph 5.6 has been amended slightly for clarity.
69	At paragraph 6.30, KR20 and KR22 we object to the requirement for Alternative Use Value (AUV) benchmark land values to be established by a valid planning permission only. Submitting an application for an alternative use in order to determine a site's value is extremely burdensome and should not be required where it can otherwise be demonstrated to the Council's satisfaction that an alternative scheme would be policy compliant. Notwithstanding our objection, if this requirement were to be retained we consider that it should be expanded to include Prior Approvals and Site Allocations within the acceptable AUV criteria.	The Council has amended the wording of the SPD regarding the extent to which Alternative Use Values will be accepted.
70	Viability Reviews - At paragraph 7.3 we object to the stipulation that no viability review can result in a scheme providing a reduced level of	The Council is proposing to maintain its position in this regard.

	<p>planning obligations from those of the original consent. After the last financial crash in 2008 a large number of developments across London and the country stalled as the diminished land values rendered the schemes unviable. This resulted in, amongst other things, the government responding by providing a greater deal of flexibility in the planning process through the introduction of S73 and S96a applications, together with applications to extend the time limit for implementing permissions. Provisions to extend the time limit for implementing permissions were subsequently rescinded after the market had stabilised and moved into growth.</p>	<p>Any reduction in the provision of affordable housing that might be identified as part of a review would not be able to be accounted for in a formal decision-making process that may otherwise decide that, on balance, the application with the reduced level of affordable housing is not acceptable in planning terms. This is why review mechanisms can't lead to a reduction in affordable housing – there are other routes, such as appeal mechanisms and the ability to submit a new application that deal with changes in macroeconomic circumstances making schemes unviable.</p>
71	DVSPD02 - Gerald Eve on behalf of Crest Nicholson London	
72	<p>GE considers that commercially sensitive confidential information should remain out of the public domain but should still be made available for consultants and Officers to review as part of the viability assessment process.</p>	<p>The SPD makes some provisions to deal with commercially sensitive information, such as through aggregation.</p>
73	<p>Regarding the assessment of Site Value (Benchmark Land Value) the SPD sets out a strict preference for "Existing Use Value plus" ("EUV+") as the default methodology. EUV+ ignores the market, is inconsistent with PPG and is in conflict with the NPPF which sets out a requirement for competitive returns to willing landowners and willing developers to enable development to be deliverable. GE considers that an over-reliance on EUV+ across all sites in the Borough is likely to prevent some sites being delivered, particularly those sites with low EUVs.</p>	<p>The SPD describes that in most cases the Benchmark Land Value will be assessed with reference to existing use value. The Council considers this is consistent with emerging and adopted guidance from the Mayor of London as well as the NPPF and NPPG.</p>
74	<p>The SPD should state that there is no absolute requirement for planning permission to be secured in order for an alternative use value (AUV) to be adopted as the basis for Site Value, in accordance with established valuation principles.</p>	<p>Noted. The Council has amended the SPD in this regard.</p>
75	<p>The SPD includes provisions for affordable housing review mechanisms to be used more widely and in circumstances which GE feels may not necessarily be appropriate by virtue of scheme size. As</p>	<p>The approach of the SPD in this regard is consistent with the Mayor of London's draft Affordable Housing and Viability SPG.</p>

	<p>set out in the RICS Guidance Note 'Financial Viability in Planning' ("the RICS GN"), review mechanisms should be reserved for use on large, phased schemes, not across the board. There is a general consensus in the development finance sector that review mechanisms generally tend to increase down-side risk. Reviews can act as a barrier to bank lending on certain sites, which can in turn, prevent sites from coming forwards for development.</p>	
<p>76</p>	<p>Transparency - It is clear that LBTH wishes to increase levels of transparency in the viability process and GE welcomes this in principle. GE considers, however, that there should be a clear statement of understanding that commercially sensitive information as set out in the EIR 2004 should remain confidential as part of the viability assessment process.</p> <p>GE would welcome a clear explanation Regulation 12 of the EIR, rather than an interpretation that leads the reader to believe disclosure should be the norm in all circumstances.</p> <p>It would be helpful to note that the Information Commissioner's Office (ICO) and the Information Tribunal have both consistently determined that information regarding commercial rents should be considered commercially sensitive as it would unacceptably prejudice the commercial interests of applicants</p> <p>The SPD should recognise the adverse effect that incorrect disclosure could have on applicants. A worst case scenario could see developers' abilities to negotiate third party payments (right of light compensation for example) or construction contracts limited by unwarranted disclosure. This could result in more protracted viability negotiations, an inadvertent decrease housing and therefore affordable housing delivery <i>in extremis</i>. Adversely impacting upon development economics could, in the round, result in developers being able to afford less affordable housing on a site specific basis.</p>	<p>In accordance with Regulation 12(1) of the EIR, the extent to which the Council can refuse to disclose commercially sensitive information relates to whether there is a public interest in non-disclosure. The Council's default position is that the public interest will generally lie in disclosure but the wording of the SPD means specific circumstances can be considered on a case by case basis.</p>

77	At paragraph 5.2 the SPD proposes to disclose viability material (or make it available) to the public and elected Members if requested. GE considers that in the event of such requests, LBTH should notify the applicant of such a request. If the disclosure is agreed to by the applicant then the process can be managed accordingly. There should be no general assumption of sharing commercially sensitive viability information without express permission from applicants.	Concerning the making of information available to elected Members, the council has received legal advice that advises that elected Members have both a Common Law and Statutory right to see information, in which they have a legitimate interest, submitted to a Council. Information will be made available to Members as a matter of course so there is no requirement for the Council to seek consent from applicants to make information available to relevant elected Members.
78	Benchmark Land Value (Site Value) - GE notes that the third bullet point of PPG paragraph 023 regarding the usage of comparable, market-based evidence, has been tailored to remove the word 'significantly' from the sentence " <i>where transacted bids are significantly above the market norm, they should not be used as part of this exercise.</i> " GE considers that the sentence should be quoted in full and in accordance with its intended meaning.	Noted. The SPD will be amended accordingly.
79	KR18: GE notes that this statement is in effect re-stating the first bullet point of PPG paragraph 023. GE would welcome reference to the second two bullet points of PPG paragraph 023 in addition which highlight the importance of both competitive returns and being informed by comparable, market-based evidence (such evidence to not be used if significantly above the market norm). Equal weighting of all three factors is suggested in PPG.	The wording of paragraph 23 of the PPG is already substantively reflected in the SPD so the Council doesn't consider it necessary to amend the wording of the SPD in this regard.
80	KR20: AUV is an established valuation basis and GE agrees that a realistic AUV can be used to form a basis for the assessment of Site Value. GE agrees AUVs should be in accordance with policy requirements. GE notes that a premium should not be placed on top of an AUV as AUV can be synonymous with Market Value. Therefore the competitive return is already accounted for in the Site Value when adopting AUV as the basis. It is however too onerous a requirement that an AUV will only be acceptable where there is an existing implementable planning permission for this use. This goes against common valuation practice and theory within which there is no absolute requirement for planning permission to be secured in order	Noted. The Council has amended the wording of the SPD in relation to the circumstances under which Alternative Use Values will be sought.

	for an AUV to be adopted as the basis for Site Value. The correct test for AUV is whether there is a reasonable prospect of securing planning permission for that use, which is as recognised by PPG.	
81	KR21: GE disagrees with the above Key Requirement. The concern about circularity raised in the SPD in respect of the use of Market Value stems from a lack of understanding of how comparable market evidence should firstly be analysed and then secondly applied. In considering market evidence, the valuer should take account of all relevant factors that affect the Site Value and reach an informed and balanced valuation judgement in respect of the subject site. The comment is therefore inconsistent with valuation methodology and should be removed from the SPD.	This key requirement is consistent with the approach described in the Mayor of London's adopted Housing SPG and the draft Affordable Housing and Viability SPG.
82	GE considers that the SPD should quote PPG in this section, which on the subject of Site Value states: <i>"Central to the consideration of viability is the assessment of land or Site Value. Land or site value will be an important input into the assessment. The most appropriate way to assess land or site value will vary from case to case but there are common principles which should be reflected. In all cases, land or site value should:</i> <ul style="list-style-type: none"> • <i>reflect policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge;</i> • <i>provide a competitive return to willing developers and land owners (including equity resulting from those wanting to build their own homes); and</i> • <i>be informed by comparable, market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise."</i> 	The Council is not against the inclusion of this paragraph in principle, however it does not see how this is useful, particularly given the paragraph is referenced in paragraph 2.10.
83	PPG is clear therefore that the assessment of Site Value will vary from case to case. Furthermore, in the assessment of Site Value there are a number of market signals of which planning policy is just one. This matter was highlighted in the Parkhurst Road (2015) and	Paragraph 2.10 clearly sets out that paragraph 23 of the PPG states that there are a range of acceptable approaches to establishing benchmark land values. The Council does not consider that the SPD is inconsistent with national guidance or that it is creating uncertainty – in describing a generally preferred

	King Street appeal decisions (Appeal refs: APP/V5570/A/14/2227656 and APP/H5390/A/13/2209347) where the respective Inspectors acknowledged how the market would approach the value of sites for development in adopting alternative methods of valuation and competition for land. Should the SPD be trying to vary from national guidance this would create uncertainty and would potentially result in it being unsound.	approach the Council considers it is providing greater certainty.
84	<p>LBTH should note that utilising EUV+ for the purposes of benchmark land value or Site Value can often inaccurately land as it is not based on market evidence. The RICS GN states:</p> <p>“One approach has been to exclusively adopt current use value (CUV) plus a margin or a variant to this, i.e. existing use value (EUV) plus a premium. The problem with this singular approach is that it does not reflect the workings of the market as land is not released at CUV or CUV plus a margin (EUV plus).”</p> <p>The approach favoured by LBTH (and the Mayor in his SPG) therefore ignores the market, is inconsistent with PPG and is in conflict with the NPPF which sets out a requirement for competitive returns to willing landowners and willing developers to enable development to be deliverable. An over-reliance on EUV+ across all sites in the Borough is therefore likely to prevent some sites being delivered, particularly those sites with low EUVs.</p>	<p>The Council is aware of the contents of the referred to RICS Guidance Note but would note that it does not constitute part of the Development Plan.</p> <p>The Council does not consider the approach advocated is inconsistent with national guidance or the NPPF.</p>
85	A further, established criticism of EUV+ is that there is no consensus on how practitioners are to arrive at an appropriate premium. Such premiums are purely arbitrary, cannot be market tested and lack relationship with the development and therefore the market. This is a further reason why EUV+ is flawed and not in accordance with PPG para. 023	The Council notes the issue with the establishment of premiums and will monitor the matter closely. However, the Council does not consider that the issue regarding premiums means the approach described in the SPD is inconsistent with national guidance.
86	On the subject of Alternative Use Value (AUV) the SPD should state that there is no absolute requirement for planning permission to be secured in order for an AUV to be adopted as the basis for Site	The Council has reconsidered its position with regard to when it will accept an Alternative Use Value as a Benchmark Land Value. It is not necessarily the case that a planning permission for the alternative use must be in place

	<p>Value. The correct test is whether prospects of securing planning permission are realistic and the scheme is feasible as recognised by PPG.</p>	<p>(however this is preferred), however the application of a particular alternative use will need to meet a number of criteria, such as:</p> <ul style="list-style-type: none"> • The alternative use would be policy compliant and would secure permission; • There would be no additional costs or delay in securing that permission – or those additional costs and delays are assessed; • The detailed alternative proposal is required to be worked up to an equivalent level of detail as the proposed housing-led scheme, incorporating realistic current day costs and values; • There is a real world demand for the alternative at the values assumed; • In the real world the landowner would really develop out the alternative rather than use it as a negotiating lever to force down AH.
<p>87</p>	<p>Review Mechanisms - In response GE considers that the necessity of viability reviews, if any, should be considered on a scheme by scheme basis in order to determine whether such a mechanism is appropriate having regard to the NPPF, PPG and London Plan. There will be many cases where schemes are not of a sufficient size or construction duration to necessitate a viability review and, indeed if applied could have a detrimental effect on delivery. Larger schemes may have been appraised using growth models in order to determine the maximum reasonable level of affordable housing and other planning obligations where again it would be inappropriate to require the addition of a review mechanism, assuming the scheme proceeds in a timely manner having regard to the particular circumstances.</p> <p>Concerning the type of review mechanism appropriate to a specific scheme, where it is agreed between the applicant and LBTH that a review mechanism is appropriate, such a review should only be undertaken prior to implementation of the scheme or particular phase in order to be in accordance with the PPG, London Plan and RICS GN.</p> <p>Regarding timings, GE considers the mid-term and advanced stage</p>	<p>The SPDs approach to Viability Reviews is consistent with the draft Mayor of London’s Affordable Housing and Viability SPG.</p> <p>The Council will work with applicants/developers in respect of review mechanisms drafted in specific S106 agreements but consider it important to set out a framework in the SPD for the basis of the formation of these parts of the agreements.</p>

	reviews set out in the SPD at paragraphs 7.16 to 7.19 are unduly prescriptive and restrictive and fail to deal with the fact that the timing for delivery/occupation of the market housing will be dependent upon the market. GE considers that a more appropriate review trigger should be a period of time rather than a percentage of occupation.	
88	Notwithstanding GE's concern regarding the principle of overage-style review mechanisms that can serve to increase development risk on sites should they be enforced, the proposed 40%/60% surplus split in favour of the Council is considered overly punitive for developers. Such a mechanism could act as a disincentive to develop in the Borough and is likely to comprise a barrier to obtaining finance.	The split described in the SPD is consistent with the split described in the Mayor of London's draft Affordable Housing and Viability SPG.
89	GE considers that a formulaic approach to pre-implementation reviews may be appropriate in some situations but not in others. The type of review mechanism should be considered on a case by case basis. Post-implementation reviews are in most cases inappropriate, as set out in the RICS GN.	The Council will of course be pragmatic in terms of the application of its position but consider it important to set out a framework in the SPD for the basis of pre-implementation reviews.
90	GE welcomes reference to how Build to Rent schemes will be treated in accordance with the requirements set out in the Mayor's Draft Affordable Housing Viability SPG (November 2016). The SPD should also reference the Government's Housing White Paper (February 2017). Both of these documents aim to encourage institutional investment in the private rented sector thereby diversifying the housing market.	Noted. The Council is conscious that the White Paper does not say anything substantive with regard to the approach to viability for Build to Rent development so does not see the value in making a reference to this document in this context. The Council is monitoring both national and regional approaches to the treatment of Build to Rent development and will form its approach accordingly in due course.
91	DVSPD13 - Health and Safety Executive	
92	DVSPD09 - Greater London Authority	
93	We welcome the borough's intention to adopt the threshold approach to viability in line with the Mayor's draft Affordable Housing and Viability Supplementary Planning Guidance.	Noted.

94	DVSPD03 - Carter Jonas on behalf of National Grid Property Holdings	
95	<p>Transparency - In principle NGPH is supportive of the transparency approach. However, the exceptions to this “in very limited circumstances” as referenced in paragraph 5.3 seems to be inflexible. A number of these assessments will include commercially sensitive information which could include items such as rights of light information, vacant possession compensation costs or allowance for acquisition of third party land etc. that could genuinely compromise an applicant’s commercial position. It is very important that these commercially sensitive elements are retained as confidential information and that this is considered in the context of the guidance in paragraph 5.3. Therefore, the wording should be amended to provide greater flexibility, which ensures that this commercially sensitive information can remain confidential.</p>	<p>Noted that the shift towards transparency is welcomed.</p> <p>The Council’s transparency requirements as described by the SPD have been formed in recognition of the importance of public participation. The Council considers the public availability of viability information as key to ensuring confidence in the planning system and that the process is open to scrutiny.</p> <p>The SPD describes that in very limited circumstances information may not be disclosed to the public, or can be aggregated to protect legitimate claims of commercial sensitivity. The Council does not consider that changes to the proposed SPD are required in this regard.</p>
96	<p>Developer’s profit - Paragraphs 6.25 and 6.26 suggest that where schemes are unviable at the proposed level of profit allowed for, the level of profit should be adjusted to the extent that the scheme as proposed becomes viable. This seems to contradict the planning policy context elements referred to in Section 2 of the report, which reaffirms the NPPF’s commitment to ensure there are competitive returns for a willing landowner or a developer to enable a development to be deliverable. If profit levels are being driven down, this drives up risk and in the current context where there is a degree of uncertainty in the financial markets (with Brexit etc.) this will raise the risk profile for banks and prospective lenders who would otherwise support a scheme. If the funding is limited and lenders see too much risk in this process, there is a real danger that development will not come forward. Therefore, if this point is progressed the end result could inadvertently be less housing and affordable housing coming forward as a result of certain schemes being seen as too ‘risky’ from an investment perspective. Therefore, NGPH object to this element of the FVA methodology.</p>	<p>Noted. The requirement in paragraph 5.6 of the SPD to express any deficit against a benchmark land value in terms of an impact against the scheme’s profit is to better inform the Council of the position of applicants where schemes demonstrate a deficit.</p> <p>The wording of paragraph 5.6 has been amended slightly for clarity.</p>

97	<p>Pre implementation reviews - Paragraph 7.10 confirms the circumstances around when a pre-implementation review would be required. Paragraph 7.11 is supported as it provides details behind what constitutes 'substantial implementation' to ensure that the requirement for pre-implementations reviews is totally clear. There are occasions when circumstances beyond a developer or applicant's control, can slow down the commencement of development. The discharge of pre-commencement conditions can sometimes cause a 'block' to the commencement of development on sites and therefore, there does need to be some sort of assurance from the LB of Tower Hamlets, that it will use best endeavours to ensure that a developer can start promptly on-site through assurances that the Council will progress this paperwork in a timely fashion. Ultimately any delays with pre-commencement conditions could prevent developers from meeting the preimplementation review threshold. This should be reflected in the wording of this section.</p>	<p>The Council will always use its best endeavours to respond to paperwork in a timely fashion.</p> <p>The Council does not consider it appropriate to describe this in an SPD.</p>
98	<p>Mid-term Reviews - Paragraph 7.16 suggests mid-term reviews which show that where more affordable housing can be provided, it should be provided on-site. It is suggested that the words 'where possible' should be inserted into this section, as this will provide some flexibility should on-site provision prove difficult to provide half way through a phased development. Every site has a unique set of circumstances and some flexibility here would be sensible to cater for these unique circumstances.</p>	<p>The Council would in most cases encourage the provision of affordable housing on site, to encourage the objective of achieving mixed and balanced communities.</p> <p>The Council cannot foresee instances where it would not be possible to provide additional affordable housing on site following a mid-term review. The fact that it may be inconvenient to a developer is not a reason for amending the SPD according to the comments provided.</p>
99	<p>Advance Stage Reviews - It is noted that any surplus generated by a review at 75% sale of market residential units will be capped according to the level of contribution required by policy and associated guidance. However, the intention is to re-provide 60% of the surplus profit to be attributed to the delivery of additional affordable housing. Given that there is considerable risk inherent in development, NGPH would suggest that any surplus should be shared 60/40 in favour of the applicant, rather than the other way</p>	<p>The split described in the SPD is consistent with the split described in the Mayor of London's draft Affordable Housing and Viability SPG.</p>

	around. This should be amended within the SPD.	
100	DVSPD11 - Environment Agency	
101	Viability Assessments are being used to justify not complying with planning policies to improve and enhance the environment. An obvious example of that might be river restoration and enhancements for the River Lee or Thames. This may also relate to requirements for the safeguarding and provision of flood defence raising from the Thames Estuary 2100 Plan. We have a better chance of securing this if involved at the pre-application stage but at the planning application it is harder to make the case unless the development would cause deterioration or prevent future improvement (thus resulting in an objection). It would be good if there was something in the SPD to state that applicants should aim to factor these costs into their schemes at the outset where they are a requirement of planning policy and justification should be provided in instances that it is considered policy requirements e.g. on the natural environment, cannot be met. There should also be an opportunity to discuss the Viability Assessment with the applicant (and Local Authority) to see if any reasonable adjustments can be made to cost assumptions which could accommodate enhancements to the natural environment.	Noted. The Council has amended paragraph 6.11 to add a requirement for build costs to reflect policy requirements.
102	The SA review concludes that many of the SA objectives for the Core Strategy fall outside the remit of the SPD e.g. on biodiversity, water quality and resources etc. Whilst we understand the comment given the purpose of the SPD is simply to provide a framework and guidance on Viability Assessments, we also struggle with that in the sense that it can have a detrimental impact on these environmental objectives, if more weight is placed on 'affordable housing' and 'viability' in general by the applicant and Local Authority in determining applications.	Noted.
103	DVSPD08 - Port of London Authority	
104	It is noted that the draft SPD focuses specifically on the	Noted.

	<p>requirements for financial viability assessments and the basis on which submitted assessments will be assessed by the Council. The SPD includes development proposals which do not provide a policy compliant level of affordable housing.</p>	
105	DVSPD05 - The Canal & River Trust	

PUBLIC CONSULTATION: DEVELOPMENT VIABILITY SUPPLEMENTARY PLANNING DOCUMENT

The Council is consulting on a draft Development Viability Supplementary Planning Document (SPD) from 5pm 31st January 2017 to 5pm 14th March 2017.

The SPD provides clear guidance on the information requirements for financial viability assessments and the basis on which these will be assessed and made public. The SPD will ensure that all planning applications are dealt with efficiently, consistently and with transparency.

Once adopted, the Development Viability SPD will be a material consideration in the determination of planning applications in Tower Hamlets.

The documents can be viewed on the Council's website: www.towerhamlets.gov.uk/viability and at the locations listed below (right):

A consultation event for the public will be held in respect of the consultation. Please refer to the web page listed above or contact the Infrastructure Planning Team for more information on this event.

How to make Comments

Comments should be made electronically or in writing in the following ways:

Email:

Joseph.Ward@towerhamlets.gov.uk

Post:

Development viability SPD Consultation
Infrastructure Planning Team
London Borough of Tower Hamlets
2nd Floor Mulberry Place
PO Box 55739
5 Clove Crescent
London E14 1BY

More Information

For more information please refer to the Council's website, www.towerhamlets.gov.uk/viability, or contact the Council's Infrastructure Planning team on 020 7364 5009 or by email to Joseph.Ward@towerhamlets.gov.uk. Please note, the consultation closes at 5pm 14th March 2017 and the Council is not able to consider any late responses.

Documents can be inspected at:

Tower Hamlets Town Hall, Mulberry Place,
5 Clove Crescent, London E14 2BG

Idea Store Bow, 1 Gladstone Place,
Roman Road, Bow, London E3 5ES

Idea Store Canary Wharf,
Churchill Place, London E14 5RB

Idea Store Chrisp Street,
1 Vesey Path East India Dock Road,
London E14 6BT

Idea Store Whitechapel,
321 Whitechapel Road, London E1 1BU

Idea Store Watney Market,
260 Commercial Road, London E1 2FB

Bethnal Green Library,
Cambridge Heath Road, London E2 0HL

Cubitt Town Library,
Strattondale Street, London E14 3HG



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PROJECT INITIATION DOCUMENT

(June 2017)

Design and Fit out of Training Centre - at the former London Fruit and Wool Exchange development (LFWE)

Version Control

[Please log the versions of the PID as it moves through the IDF process. This is to ensure that the correct/final version is signed and submitted for reporting.]

Version Number	Author and Job Title	Purpose/Change	Date
0.1	Joyce Ogunade, Economic Benefits Manager	<i>E.g. Initial draft to IDSG Finance Subcommittee</i>	2 nd June 2017
0.2	Joyce Ogunade, Economic Benefits Manager	<i>E.g. Second draft to IDSG</i>	18 th June 2017
1.0		<i>E.g. Final version</i>	

Project Initiation Document (PID)

Project Name:	Design and Fit Out of Training Centre at the former London Fruit and Wool Exchange development (LFWE)		
Project Start Date:	September 2017	Project End Date:	July 2018
Relevant Heads of Terms:	TRNG		
Responsible Directorate:	Place		
Project Manager:	Joyce Ogunade		
Tel:	020 7364 2864	Mobile:	07904160847
Ward:	Spitalfields and Banglatown		
Delivery Organisation:	Growth and Economic Development LBTH		
Funds to be passported to an External Organisation? ('Yes', 'No')	No		
Does this PID involve awarding a grant? ('Yes', 'No' or 'I don't know')	No		
Supplier of Services:			
Is the relevant Lead Member aware that this project is seeking approval for funding?	Yes		
Is the relevant Corporate Director aware that this project is seeking approval for funding?	Yes		

Does this PID seek the approval for capital expenditure of up to £250,000 using a Recorded Corporate Director's Action (RCDA)? (if 'Yes' please append the draft RCDA form for signing to this PID)	No
Has this project had approval for capital expenditure through the Capital Programme Budget-Setting process or through Full Council? ('Yes' or 'No')	No
<u>S106</u>	
Amount of S106 required for this project:	£500,000
S106 Planning Agreement Number(s):	PA/11/02220 and PA/11/02221
<u>CIL</u>	
Amount of CIL required for this project:	N/A
Total CIL/S106 funding sought through this project	£500,000
Date of Approval:	28 March 2013

This PID will be referred to the Infrastructure Delivery Steering Group (IDSG):

Organisation	Name	Title
LBTH – Place	Aman Dalvi	Corporate Director
LBTH – Place	Owen Whalley	Divisional Director Planning & Building Control
LBTH – Resources	Paul Leeson	Business Manager
LBTH – Place	Andy Scott	Divisional Director for Growth & Economic Development
LBTH – Place	Matthew Pullen	Infrastructure Planning Manager
LBTH –	Fleur Francis	Team Leader, Planning Legal

Organisation	Name	Title
Governance		
LBTH – Governance	Marcus Woody	Planning Lawyer
LBTH – Governance	Andy Simpson	Business Improvement & S106 Programme Manager
LBTH – Governance	Vicky Allen	S106 Portfolio Coordinator
LBTH – Governance	Tope Alegbeleye	Strategy, Policy & Performance Officer
LBTH – Governance	Thorsten Dreyer	Strategy & Business Development Manager - Culture, Public Realm and Spatial Planning
LBTH – Health, Adults and Community	Tim Madelin	Senior Public Health Strategist
LBTH – Children’s	Pat Watson	Head of Building Development
LBTH – Place	Adele Maher	Strategic Planning Manager
LBTH – Place	Paul Buckenham	Development Manager
LBTH – Place	Alison Thomas	Head of Housing Strategy, Partnerships and Affordable Housing Strategy, Sustainability and Regeneration
LBTH – Place	Richard Chilcott	Head of Asset Management
LBTH – Place	Jonathan Taylor	Sustainable Development Team Leader
LBTH – Place	Abdul J Khan	Service Manager, Energy & Sustainability
LBTH – Place	Christopher Horton	Team Leader, Infrastructure Planning

Related Documents

ID	Document Name	Document Description	File Location
If copies of the related documents are required, contact the Project Manager			

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1.0 Purpose of the Project Initiation Document

- 1.1 As part of the S106 Agreement and employment obligations for the development at the former London Fruit and Wool Exchange, there is a commitment for the developer to provide a new temporary space for the Council for a 10 year rent and service charge free period. After the 10 year period, the space is to be handed back to the landlord. The space will provide an opportunity to establish a local skills and jobs service that will enhance local engagement of workless residents, and assist them on their journey towards economic activity and employment. It is anticipated the new training and employment facility will lead to an increased volume of local residents taking up job vacancies.
- 1.2 The facility is to be used as an employment and skills centre and will be located on the lower ground floor within a commercial and residential site at the former London Fruit and Wool Exchange permitted under planning references PA/11/02220 and PA/11/02221. The confirmed floor space for the facility is 500 square metres (Gross Internal Area). The training centre will be offered as a shell and core space.
- 1.3 This Project Initiation Document (PID) is concerned with the procurement of a contractor to undertake 'design and fit-out' of the training centre premises. The developer is providing a s106 financial contribution of £500,000 to cover the fit-out of the training centre. This funding has been agreed within the Heads of Terms and is ring fenced for the work associated with the fit out of this centre.
- 1.4 As a result of the timeline for receipt of the financial contribution in November 2017, and the tight time frame for delivery, the Growth and Economic Development Service is requesting the funds be agreed in advance to enable the project to start on time in line with the planned procurement process. There is no tangible risk involved in this.
- 1.5 At present, the Council's tenancy is due to begin in April 2018. The Council has requested a three month grace period to allow fit out works to be completed. In the event that payments and/or the procurement for the fit out is delayed, the Council will be liable for all costs associated with the space whilst it is empty including business rates and insurance payments. We are currently awaiting these costs from the developer and our internal teams. These payments will be the responsibility of the Council until the training provider moves into the space.

2.0 Section 106

Background

- 2.1 Section 106 (S106) of the Town and Country Planning Act 1990 allows a Local Planning Authority (LPA) to enter into a legally-binding agreement or planning obligation with a developer over a related issue. Planning Obligations/S106 agreements are legal agreements negotiated between a LPA and a developer, with the intention of making acceptable development which would otherwise be unacceptable in planning terms.
- 2.2 On the 5th January 2016, the Mayor in Cabinet agreed the implementation of a new Infrastructure Delivery Framework which will help ensure the process concerning the approval and funding of infrastructure using CIL/S106 will be appropriately informed and transparent.

S106

- 2.3 This S106 PID is part of the Tower Hamlets Council S106 Delivery Portfolio and is aligned with the agreed Heads of Terms (HoT) for the Deed creating Planning Obligations and undertakings for the development at the former London Fruit and Wool Exchange - with address in Brushfield St, 99-101 Commercial Street, 54 Brushfield St & Whites Row Car Park permitted under planning references PA/11/02220 and PA/11/02221. The site is Grade II listed, however, this will not impact the fit out works of the facility.
- 2.4 The agreement dated 28th March 2013 obliged the developer to pay the Council a total of £1,200,000. This is broken down as follows; £700,000 for financial contributions towards employment, skills and training and an additional contribution of £500,000 towards the fit-out and provision of the training centre, to be paid to the council in November 2017, which is six months before practical completion is anticipated.

Planning Application	Site Address	Date Received	Expiry Date	Expiry Note	Funding Requirement	Amount Received	Amount Requested
PA/11/02220	London Fruit and Wool	22/06/16	TBC	Within 10 years from the date of practical completion of whole development	Provision of local training employment and enterprise initiatives in connection with the construction and operation phases of the development	Due Nov 2017	£500,000

CIL

2.5 This PID does not seek approval for the expenditure of CIL funding

3.0 Legal Comments

3.1 Legal Services considers the design and fit out of the Training Centre at the former London Fruit and Wool Exchange to satisfy the terms of the S106 agreement set out at paragraph 2.6 above.

3.2 This PID seeks to use the contribution for the procurement of a contractor to undertake the 'design and fit-out' of the Employment and Skills Centre. Legal Services is satisfied this clearly reflects the various parties' intentions at the time the agreement was entered that the financial contribution would be used for the Council to spend on setting up the Employment and Skills Centre. Furthermore, this obligation has been specifically worded so that it can only be used for this purpose and as such if the money was not used for this project it would need to be repaid to the party who paid the original contribution.

3.3 The Council should be mindful of the risk of entering into a contract before the relevant contribution is received. Whilst it is anticipated that the contribution will be received in November 2017, should the timeline for practical completion be delayed for any reason or the developer default on the agreement then this could impact on the project. Legal therefore supports the fact that this has been identified as a risk in paragraph 14.0.

3.4 When approving this PID, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who

share a protected characteristic and those who do not (the public sector equality duty). A proportionate level of equality analysis is required to discharge the duty.

3.5 These comments are limited to addressing compliance with the terms of the S106 agreement mentioned above (as based on the information detailed in the PID) and advice on any other legal matters (such as advice on procurement) should be sought separately if appropriate.

4.0 Overview of the Project

4.1 The Council requested and secured a 500sqm commercial space as part of the development of the former London Fruit and Wool Exchange through S106 agreement. This was identified by the Growth and Economic Development Service as an opportunity to develop and expand training and employment provision in central key areas of Tower Hamlets.

4.2 The proposed use for the premises is for a training centre (office) under class B1 use. The duration of the lease is 10 years and will be rent and service charge free; with business rates, insurance of the premises and all associated costs for the space being the responsibility of the sub-tenant. The total rent costing for the location of the premises is of an estimated value of £1,000,000 for the 10 years. The site will be available for the contractors to begin the fit out of the space from April 2018, with the chosen occupier moving in from July 2018.

4.3 It is anticipated that the space will require a medium specification fit-out (suspended floor and ceilings, power stations, lighting, etc.) The Growth and Economic Development Service has already consulted with the Council’s architectural team to obtain estimated costs for fitting-out the premises as well as the timeline of works required.

4.4 Through S106 contributions the developer will pay the Council an additional £500,000 to support workspace fit-out and related set up costs. The estimated costs known at present are as follows;

Table 1: Costs breakdown	
Main Works	£325,000
Feasibility Design for project approval	£5,500
Acoustic Consultants	£4,000
Mechanical & Electrical design	£4,500
Structural Engineers	£4,500
Building Compliance Approvals/Building Control Submission	£2,000
Planning Application	£385
CDM / Principle Designer	£3,000

Architecture Team fee @ 11.5% incl; <ul style="list-style-type: none"> • Project Architect - all design and specification's translated from Client requirements • Contract Administrator - between Client and Contractor utilising traditional standard construction contract • Design Manager – managing all external designers for e.g. M&E designers to create a fully coordinated design 	£31,875
<ul style="list-style-type: none"> • External QS fees 6.5% Quantity Surveyor (subject to appointment and their fee agreement) to ensure project meets within the clients budget 	£37,375
Fire Fighting Equipment	£20,000
Porterage	£20,000
Legal costs for land searches	£780.26
Contingency	£41,084.74
Total	£500,000

**All of the above are estimated*

- 4.5 The £325k main works is an estimation provided by our internal architectural team, based on the feasibility study carried out. This work will include but is not limited to;
- Structural reconfigurations if necessary, Such as new door openings within the existing structure.
 - New internal reorganisation to the main space, to the client's needs i.e. new rooms created.
 - Toilet provisions required by the end tenant, number to be confirmed.
 - M&E works essential for the end tenants needs – air con, lighting, sockets, mechanical fittings, sinks, kitchen, vent extract etc.
 - All fixtures and fittings required by the end tenant – meeting rooms, fixed storage etc.
 - All decorative works – painting, carpets, need to take the space beyond the supplied shell & core specification.

The information above is an estimate of the work to be provided and final information will only be known once the end tenant has been identified.

- 4.6 The design costs and fees are based upon a percentage of the overall construction costs. This has been based on CDAT scale of fee charges.
- 4.7 The council intends to sublet the premises, as agreed in the Heads of Terms to an external training and employment provider during the agreed period. The provider will be selected through the council's procurement process. The provider will be expected to access funding for training from external funding sources such as Skills

Funding Agency or European Social Funding as appropriate. The council will not provide delivery funding to the chosen provider and all bidding organisations will be expected to outline and discuss their business model and sustainability within their tender.

- 4.8 The risk of not successfully accessing the funds would delay the chosen provider from occupying the site in July 2018. The council will be liable to cover all costs and expenses whilst the building is empty which will result in a cost to the Council.
- 4.9 In addition to the financial costs to the council should the works be delayed, the chosen provider will have a shorter tenancy within the site, as the 10 year tenancy is due to begin in April 2018, however, negotiations are underway to delay this until July 2018 to allow the fit out works to be completed.

5.0 Business Case

5.1 Overview/General

- 5.1.1 Investment in training and skills opportunities are advantageous for residents, employers and the council as they assist with the integration of the development within the borough, and in improving relationships with residents.
- 5.1.2 Tower Hamlets has a strong and successful local economy with just over 5% of London's total employment concentrated within the borough. The borough also accounts for some 30% of all jobs in East London.
- 5.1.3 Recent development work has identified a large number of workless residents in and/or around the Spitalfields and Whitechapel area of Tower Hamlets. The Employment and Enterprise team within the Council has explored extending the provision of its employment and brokerage services to assist local people into jobs.
- 5.1.4 The service would focus its engagement on the local residential area of the West of the borough. It would also tap into the local employment market which includes the retail, hospitality and hotels sectors. The facility and its advisers would work alongside other services including WorkPath and local partners to co-ordinate the service offer and form part of the Council's overall response to low employment rates and high unemployment rates.
- 5.1.5 The project is intended to help the council and partners respond to the changes in the economy and labour market, by providing a strategic and coordinated local resource-offer for a wide range of workless residents.
- 5.1.6 The chosen provider will work in partnership with WorkPath and other relevant partners to ensure the necessary outputs are delivered. The training to be delivered from this new service will be classroom based but the service to be provided will not be known until the training provider has been selected.

5.1.7 The successful delivery of this project contributes towards the Borough's Community Plan corporate themes. They are also in line with national priorities with respect to educational attainment and to tackling worklessness, with a particular focus on vulnerable and excluded communities:

- Creating and sharing prosperity – by increased educational and vocational training routes into employment.
- Excellent public services – by a greater targeting of services to the most vulnerable and excluded communities as well as greater engagement opportunities.

5.1.8 The two themes are considered as key drivers for 'One Tower Hamlets' agenda and are translated into the Employment Strategy via the following five strategic objectives:

1. Making mainstream services work better for residents
2. Engaging workless residents detached from the labour market and complement the work of the mainstream.
3. Encouraging increased aspiration towards engaging with the labour market, particularly for economically inactive groups.
4. Ensure economic investment is co-ordinated and focused.
5. Capture employment opportunities for Tower Hamlets residents within the borough and wider London labour market.

The appointed training provider will be expected to deliver training and employment support services in order to achieve the following outputs over the ten year period;

- 1000 unemployed residents to be engaged per year
- 305 residents trained/upskilled per year
- 150 residents placed into jobs per year (1,500 residents placed into employment over the lifetime of the project)

The exact nature of the outputs to be delivered will be discussed with training providers at tender stage. We do not wish to be prescriptive with outputs. This will allow suitable recommendations from those bidding and provide the opportunity for them to expand on what is to be delivered and how they will achieve this.

The training to be delivered at the facility is currently unknown. The training provider tender will be open to all bidders who are able to provide a classroom based training facility with the outputs required.

5.2 Project Drivers

5.2.1 An independent consultant was engaged in November 2015 to undertake a comprehensive review of employment support provision across the borough. The report was taken to Cabinet in April 2016 and made a number of recommendations. The key message was that, "...the council should strengthen its strategic role and lead on the establishment of a clearer, better coordinated and more efficient local employment and skills system..." to better enable all services to address the needs of residents, to maximise the use of ever dwindling resources whilst making significant savings to the public purse; and to ensure that local people can benefit directly and personally from the projected growth of the borough.

5.2.2 The planning obligations being provided with specific commitments to delivering local job creation and training, through the establishment of the employment and skills centre, offer a major public benefit to the Borough.

5.2.3 The landlord will ensure that they and future tenants of the surrounding space will make a commitment for occupiers to work with the chosen provider- for example, by committing to providing advanced information on all employment opportunities to the chosen provider.

5.3 Deliverables, Project Outcomes and Benefits

5.3.1 The design and fit out of the London Fruit and Wool training centre will be produced in partnership with the winning provider. This will enable the facility to be ready for service delivery of employment support to the boroughs residents.

5.3.2 This project will convert the provided shell and core space into a dedicated training facility for local residents. Bespoke training courses, developed in partnership with employers, will be delivered from the centre, with training courses linked to live vacancies or in anticipation of forthcoming opportunities.

5.3.3 The selected supplier will respond to a specific brief for the design and fit out provision to be delivered, and work on behalf of the council.

5.3.4 Table 1 (section 4.1) shows the breakdown of the deliverables this PID is expected to deliver.

5.4 Other Funding Sources

As per the section 106 agreement, the sum of £500,000 is to be used by the council towards the cost of setting up the new facility. There are no other funding sources available for this project and there is no requirement or expectation for match funding.

5.5 Related Projects

5.5.1 Prior to the procurement of the contractor for the fit-out, a training and employment provider will be procured to occupy and deliver training and employment support services, secured through the S106 in relation to the redevelopment of London Fruit and Wool Exchange. The procurement of the training provider is necessary in advance of the design and fit out to ensure the correct specification is provided for the services to be delivered. Funding is not required for the training provider element of this contract.

5.5.2 The procurement of the training provider will be subject to OJEU procurement rules, and we will ensure the Councils procurement policies and guidelines are followed, including ensuring a transparent process and equal opportunities are provided. In order to allow a fair procurement process, it will be open to all providers, not just locally registered organisations.

5.5.3 The winning provider will work in partnership with the Councils WorkPath-Integrated Employment Service, as well as other local partners and council services. We wish to ensure partnership working where possible with established local organisations, rather than them working in competition.

5.5.4 The training provider is expected to be appointed by 18 September 2017, with the design and fit out tender to be advertised before the end of October 2017. This timeline will enable contractor works to begin on site in April 2018.

5.5.5 The winning provider will be expected to meet the Councils safeguarding requirements.

5.5.6 The winning provider will be able to move into the facility from July 2018.

6.0 **Approach to Delivery and On-going Maintenance/Operation**

6.1 We will apply effective public procurement, prioritising good design outcomes to

maximise the social, environmental and economic benefits of the development. The delivery approach will utilise competitive tenders, due to the unique requirements of the site, the cost of the development and high end finish required. A publicly advertised tender (rather than framework) will be used to maximise the potentiality for a specialised contractor. Once designed with LBTH client, selected tenant and architect, the Quantity Surveyor will compile a tender package utilising LBTH standard requirements and produce a pre-tender estimate for projection/comparison analysis. (Appendix G) All compliant tender returns will be evaluated by the design team and QS. The selected contractor will be engaged using a construction contract, the work will be monitored by our internal architectural team on-site who will be project managing the design and fit out of this facility. The architectural team will ensure the project is delivered on-time and in budget. Once completed, all works to be inspected and a standard retention withheld from the contractor for one year defects liability period, to return to the site to remedy defects, if required.

- 6.2 The facility will be maintained by our asset and facilities management team. All costs will be passed to the chosen provider for the duration of the lease. Should the facility be handed back to the council or be empty at any point, the Council will be responsible for repairs and maintenance on top of business rates and insurances.
- 6.3 The role of the Asset Management team is to set up the property relationships between the Council and the building owner and between the Council and the training provider, which will occupy the building. The relationships will be documented in leases. The terms of the lease between the Council and the owner have been agreed and a draft lease is being negotiated. The terms of the lease between the Council and the provider are yet to be determined. The Council will have the opportunity to set out the proposed lease terms as part of the process for procuring the provider. It is open to the Council to propose a structure of responsibilities and costs liabilities within the lease in relation to the maintenance that will fall to the Council under its lease. The options include;
- Making the provider responsible for carrying out maintenance,
 - The Council carrying out maintenance, with or without cost recovery,
 - A split of responsibilities between the Council and provider

7.0 Infrastructure Planning Evidence Base Context

One Employment and Enterprise related project has been identified in the current Evidence Base. This is for Employment, Training and Information Outreach Sites to enable the delivery of facilities offering employment and training support and

information, in locations accessible to key target groups in areas with high levels of economic/employment inactivity. This project could be considered to meet this objective, but it also fulfils a very specific S106 planning obligation, which the council is obligated to comply with. The proposed training centre would enable the delivery of a local skills and jobs service that would enhance local engagement of workless residents, and assist them on their journey towards economic activity and employment. This objective is in line with the Council's adopted Employment Strategy and the Community Plan 2015.

8.0 Opportunity Cost of Delivering the Project

The project is fulfilling a specific S106 obligation for the design and fit out of a new employment and skills centre at London Fruit and Wool Exchange. The funds provided are ring-fenced for the fit out of this facility and are unable to be used for anything else.

9.0 Local Employment and Enterprise Opportunities

This project is specifically designed to create and enhance training and employment services and opportunities for local residents looking for work, and as such meets the council's criteria in relation to the securing of economic benefits within its project delivery. The training facility will be designed in partnership with the appointed training provider to ensure that services are delivered in a flexible way, accessible and fit for purpose.

The facility will enable the Council to extend its reach into an area of the borough where it does not have a dedicated facility. By working closely with the training provider we are able to generate more work experience placements, apprenticeships, and employment opportunities for local residents with which they may not have originally been able to access. The training assists in bridging the gap between local employers and the community by developing working partnerships that meet the requirements of businesses and the unemployed residents.

10.0 Financial Programming and Timeline

Project Budget

Table 2
Financial Resources

Description	Amount	Funding Source	Funding (Capital/ Revenue)
Main Construction Works	£325,000	S106	Capital
Design Team costs (Architectural, QS, Acoustic, CDM, Planning Structural, M&E,)	£110,000	S106	Capital
Contingency (unanticipated overspend on fit out costs, legal fees)	£65,000	S106	capital
Total including VAT	£500,000		

Any monies not spent will be returned to the S106 portfolio.

Project Management

The design and fit out will be managed by the LBTH Architectural team with Growth & Economic Development Service overseeing the project.

Financial Profiling

Table 3									
Financial Profiling									
Description	Year 2017/8				Year 2018/9				Total
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Main Construction Works					£325,000				£325,000
Design Team costs (Architectural, QS, Acoustic, CDM, Planning Structural, M&E,)			£33,000	£33,000	£44,000				£110,000
Contingency, legal costs, other costs					£65,000				£65,000
Total									£500,000

Outputs/Milestone and Spend Profile

Table 4			
Project Outputs/Milestone and Spend Profile			
ID	Milestone Title	Baseline Spend	Baseline Delivery Date
1	Procurement of design and fit out contactors		October 2017
2	Contract Awarded		November 2017
3	Tender Report	<ul style="list-style-type: none"> • 65% of design fees 	December 2017
4	On Site	<ul style="list-style-type: none"> • 70% of design fees 	April 2018
5	Works 50% Complete	<ul style="list-style-type: none"> • Further 20% of design fees (85% total) • 50% of construction fees 	Mid – late May 2018
6	Practical Completion	<ul style="list-style-type: none"> • Further 10% of design fees (95% total) • Further 45% of construction fees paid (95% total) 	End of June / early July 2018
7	Final Accounts	<ul style="list-style-type: none"> • Remaining 5% of design fees • Remaining 5% of construction fees 	End of June / early July 2019
Total		£500,000	

11.0 Project Team

11.1 Information regarding the project team is set out below:

- Project Sponsor: Aelswith Frayne
- Project Manager: Joyce Ogunade

12.0 Project Reporting Arrangements

Table 5			
Group	Attendees	Reports/Log	Frequency
IDSG Sub Group	Numerous – defined in terms of reference (ToR).	Monitoring Report	Quarterly

Table 5			
Group	Attendees	Reports/Log	Frequency
IDSG	Numerous – defined in ToR.	Monitoring Report	Quarterly
IDB	Numerous – defined in ToR	Monitoring Report	Quarterly
Project Partnership Board	Nominated representatives from LBTH, Exemplar and appointed contractor and Training Provider	Update Reports	Monthly

13.0 Quality Statement

The construction project will be balanced between cost, time and quality. The aim is to have high quality and low cost, within the tight timescales allocated. The success of the project will be measured on providing a bespoke space for a particular client, which will maintain the high standards, set out throughout the ten year lease of the space, ensuring a positive contribution to the borough.

During the design phase, following design meetings, proposed works will be presented to the chosen provider for approval before being submitted to the QS and then bidding contractors for pricing. When the tenders are returned they will be reviewed by the architectural team, QS and Economic Development. Once a suitable contractor is appointed, in budget, we will use a standard building contract to enable us to mediate between the client and contractor, QS to monitor the costs, as the build progress, through a series of valuations, based upon the works done on-site. When the project is completed, it will be snagged by the architect, evaluated by the QS and the client is consulted to approve the finished works, accordingly. A retention fee will be kept from the contractor (2.5% of the entire construction as standard) for one year after the agreed practical completion date, in order for the contractor to return to repair any latent defects.

The chosen provider will be heavily involved in the design and fit out of the space. The building will be handed over to the chosen provider on completion of fit out. They will be expected to accept the building as delivered and in the event of any fit out issues, this would be managed through a dispute resolution process.

14.0 Key Risks

14.1 The key risks to this project are set out in the Table 6 below:

Table 6							
Risk No.	Risk	Triggers	Consequences	Controls	Likelihood	Impact	Total
1	S106 funding delayed	Unable to draw down funding in advance	Delayed start on site, which will delay the chosen provider moving in within the specified timeframe. Should this occur, the council will be liable for all costs whilst the building remains empty	IDSG forward fund	2	3	6
2	Procurement of training provider not completed within timeframe which will delay the fit out work	Delayed procurement process	Delayed fit out start, resulting to late occupation of the facility. The council will be liable for all costs when facility is empty	Partnership working with procurement and asset management	2	3	6
3	Site not available in time	Contractors delay	Delayed start on-site & opening date- no cost to the council should this occur as the developer will pick up costs	Ongoing communication with developer (landlord)	2	2	4
4	Budget	Training tenant requirements	Overspend or Value Engineering	Communication with tenant, designer and QS to manage design and cost, contingency allowed for in tender package	1	2	2

15.0 Key Project Stakeholders

15.1 The principal stakeholders are shown in Table 6 below and will be engaged from the earliest stages of the project and through to project closure. The key stakeholders will be engaged as required, after delivery is completed.

Table 7			
Key Stakeholders	Role	Communication Method	Frequency
LBTH Economic Development	Lessee	Project Steering Group Meetings	Bi-monthly and more frequently if needed
Exemplar	Landlord/Lessor	Project Steering Group Meetings	Bi-Monthly and more frequently if needed
Contractor	Delivery Partner	Project Steering Group Meetings	Bi-monthly and more frequently if needed
Training Provider	Sub-tenant	Project Steering Group Meetings	Bi-Monthly and more frequently if needed
LBTH Asset Management	Property Services	Project Steering Group Meetings	Bi-monthly and more frequently if needed

16.0 Stakeholder Communications

16.1 LBTH, Exemplar (landlord), the successful contractor, and the training provider will nominate representatives to sit on a Project Steering Group that will oversee the project. Employer representatives will be sought in order to ensure that the project remains truly reflective of employer needs. The Steering group will meet bi-monthly and will ensure consistent and regular information flow between key partners.

16.2 In the event of dispute resolutions, the dispute will attempt to be resolved at these meetings in the first instance.

16.3 Following completion of the fit out and during the operational phase of the chosen provider, the winning provider, landlord and construction contractor will provide a dedicated 'liaison officer' who will work with the Council to ensure the employment and training outputs are delivered.

16.4 Each organisation will relay project progress/success to its respective management bodies via its reporting mechanisms.

17.0 Project Approvals

The PID has been reviewed and approved by the Chair of the IDSG and the Divisional Director for the Directorate leading the project.			
Role	Name	Signature	Date
IDSG Chair	Ann Sutcliffe		
Divisional Director, Growth & Economic Development	Andy Scott		

Project Closure

[Please note that once this project has been completed a Project Closure Document is to be completed and submitted to the Infrastructure Planning Team and the S106 Programme Manager.]

Appendices

[Amend as necessary]

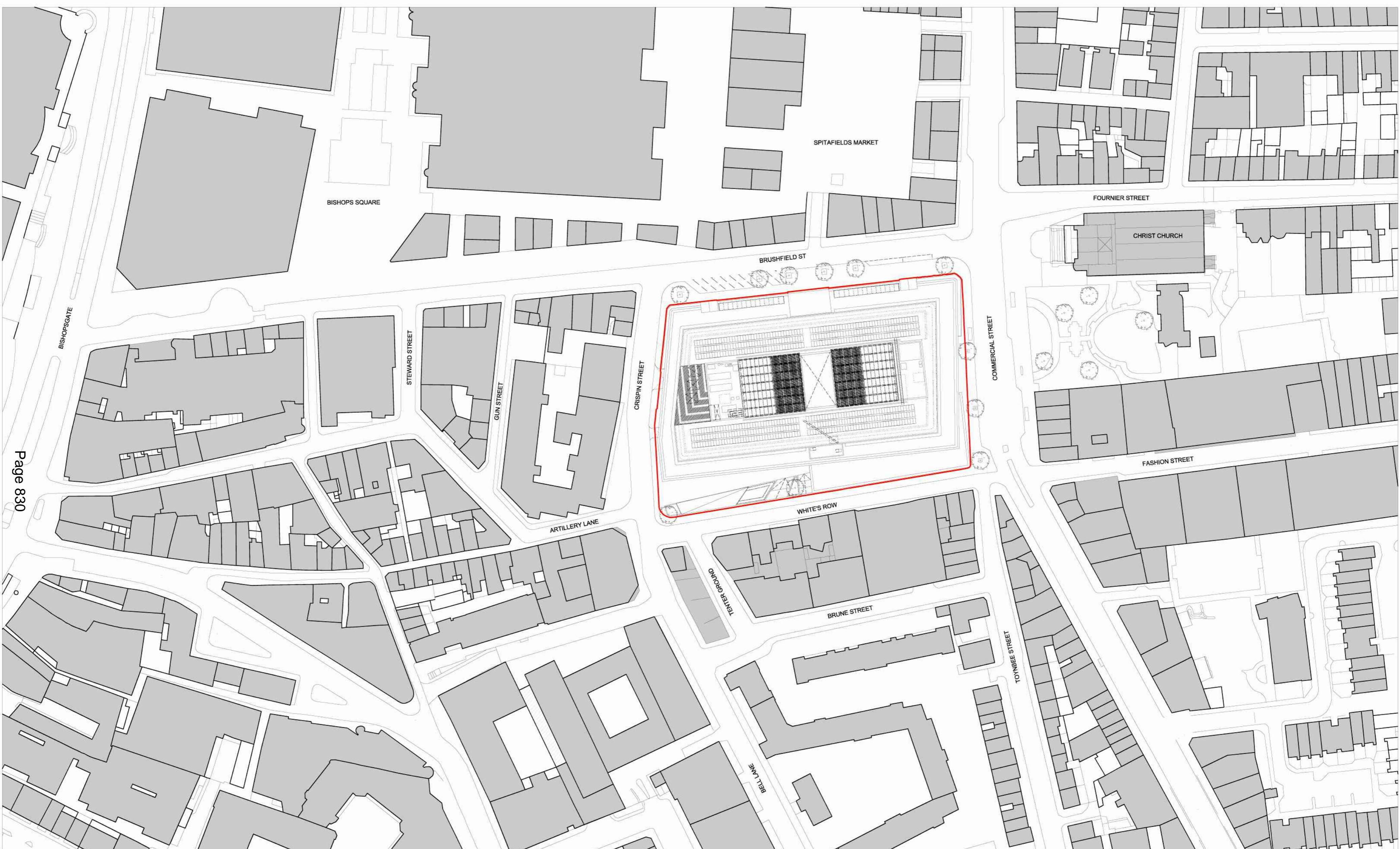
- Appendix A: Recorded Corporate Director's Action Form;
- Appendix B: Risk Register;
- Appendix C: Project Closure Document
- Appendix D: Shell & Core Specification
- Appendix E: draft LFWE Lease Agreement
- Appendix F: LFWE Heads of terms
- Appendix G: Programme timetable

Project Closure Document

Project Closure Document							
1.	Project Name:						
2a.	Outcomes/Outputs/Deliverables I confirm that the outcomes and outputs have been delivered in line with the conditions set out in the any Funding Agreement/PID including any subsequently agreed variations.	Please Tick ✓ <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">Yes</td> <td style="width: 25%;"></td> <td style="width: 25%; text-align: center;">No</td> <td style="width: 25%;"></td> </tr> </table>		Yes		No	
Yes		No					
2b.	<ul style="list-style-type: none"> Key Outputs <i>[as specified in the PID]</i> Outputs Achieved <i>[Please provide evidence of project completion/delivery e.g. photos, monitoring returns / evaluation]</i> Employment & Enterprise Outputs Achieved <i>[Please specify the employment/enterprise benefits delivered by the project]</i> 						
3a.	Timescales I confirm that the project has been delivered within agreed time constraints.	Please Tick ✓ <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">Yes</td> <td style="width: 25%;"></td> <td style="width: 25%; text-align: center;">No</td> <td style="width: 25%;"></td> </tr> </table>		Yes		No	
Yes		No					
3b.	<ul style="list-style-type: none"> Milestones in PID <i>[as specified in the PID]</i> Were all milestones in the PID delivered to time <i>[Please outline reasons for any slippage encountered throughout the project]</i> Please state if the slippage on project milestone has any impacts on the projects spend (i.e. overspend) or funding (e.g. clawback) 						
4a.	Cost I confirm that the expenditure incurred in delivering the project was within the agreed budget and spent in accordance with PID	Please Tick ✓ <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">Yes</td> <td style="width: 25%;"></td> <td style="width: 25%; text-align: center;">No</td> <td style="width: 25%;"></td> </tr> </table>		Yes		No	
Yes		No					
4b.	<ul style="list-style-type: none"> Project Code Project Budget <i>[as specified in the PID]</i> Total Project Expenditure <i>[Please outline reasons for any over/underspend]</i> Was project expenditure in line with PID spend profile <i>[Please outline reasons for any slippage in spend encountered throughout the project]</i> 						

5.	Closure of Cost Centre I confirm that there is no further spend and that the projects cost centre has been closed. <ul style="list-style-type: none"> • Staff employment terminated • Contracts /invoices have been terminated/processed 	Please Tick ✓			
		Yes		No	
		Yes		No	
		Yes		No	
6.	Risks & Issues I confirm that there are no unresolved/outstanding Risks and Issues	Please Tick ✓			
		Yes		No	
7.	Project Documentation I confirm that the project records have been securely and orderly archived such that any audit or retrieval can be undertaken.	Please Tick ✓			
		Yes		No	
		These records can also be accessed within the client directorate using the following filepath: <i>[Please include file-path of project documentation]</i>			
8.	Lessons learnt				
	<ul style="list-style-type: none"> • Project set up <i>[Please include brief narrative on any issues faced/lessons learned project set up]</i> <hr/> <hr/> <hr/>				
	<ul style="list-style-type: none"> • Outputs <i>[Please include brief narrative on any issues faced/lessons learned in delivering outputs as specified in the PID, including the management of any risks]</i> <hr/> <hr/> <hr/>				
	<ul style="list-style-type: none"> • Timescales <i>[Please include brief narrative on any issues faced/lessons learned in delivering project to timescales specified in PID]</i> <hr/> <hr/> <hr/>				
	<ul style="list-style-type: none"> • Spend <i>[Please include brief narrative on any issues faced/lessons learned regarding project spend i.e. sticking to financial profiles specified in the PID, under or overspend]</i> <hr/> <hr/> <hr/>				
	<ul style="list-style-type: none"> • Partnership Working <i>[Please include brief narrative on any issues faced/lessons learned re: internal / external partnership working when delivering the project]</i> <hr/> <hr/> <hr/>				
<ul style="list-style-type: none"> • Project Closure <i>Please include brief narrative on any issues faced/lessons learned project closure]</i> <hr/> <hr/> <hr/>					

	<p style="text-align: center;">-----</p>		
9.	<p>Comments by the Project Sponsor including any further action required <i>[Use to summarise project delivery and any outstanding actions etc]</i></p> <p style="text-align: center;">-----</p> <p style="text-align: center;">-----</p>		
10.	<p>The Project Sponsor and Project Manager are satisfied that the project has met its objectives and that it can be formally closed.</p>		
	Sponsor (Name)		Date
	Project Manager (Name)		Date



Revisions
 \ 110823 First Issue, Issued for Planning.
 A 120120 Revised Issue for Planning

By Chk
 FM RB
 KL RB

By Chk Notes

— Site Boundary Line

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Project
London Fruit and Wool Exchange
 Exemplar Properties

Project No. 0923

Drawing Title
Proposed Site Plan

Drawing Number
0923_P20_SP00

Revision
A

Scale @ A3
1 : 1250

Scale @ A1
1:625

Revision Date
120120



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