

Cabinet



Wednesday, 16 December 2020 at 5.30 p.m.

Online 'Virtual' Meeting - <https://towerhamlets.public-i.tv/core/portal/home>

Full Agenda Pack

Mayor John Biggs

Cabinet Members

Councillor Sirajul Islam	(Statutory Deputy Mayor and Cabinet Member for Housing)
Councillor Rachel Blake	(Deputy Mayor and Cabinet Member for Adults, Health and Wellbeing)
Councillor Asma Begum	(Deputy Mayor and Cabinet Member for Community Safety, Youth and Equalities)
Councillor Sabina Akhtar	(Cabinet Member for Culture, Arts and Brexit)
Councillor Danny Hassell	(Cabinet Member for Children and Schools)
Councillor Candida Ronald	(Cabinet Member for Resources and the Voluntary Sector)
Councillor Motin Uz-Zaman	(Cabinet Member for Work and Economic Growth)
Councillor Mufeedah Bustin	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Social Inclusion
Councillor Asma Islam	Cabinet Member for Environment and Public Realm (Job Share) - Lead on Environment
Councillor Eve McQuillan	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Planning
Councillor Dan Tomlinson	Cabinet Member for Environment and Public Realm (Job Share) - Lead on Public Realm

[The quorum for Cabinet is 3 Members]

Further Information

Reports for consideration, meeting contact details, public participation and more information on Cabinet decision-making is available on the following pages.



Public Information

Viewing or Participating in Cabinet Meetings

The public are welcome to attend meetings of the Cabinet. Procedures relating to Public Engagement are set out in the 'Guide to Cabinet' attached to this agenda. Except where any exempt/restricted documents are being discussed, the public are welcome to view this meeting through the Council's webcast system.

Physical Attendance at the Town Hall is not possible at this time.

Meeting Webcast

The meeting is being webcast for viewing through the Council's webcast system.

<http://towerhamlets.public-i.tv/core/portal/home>

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A Guide to CABINET

Decision Making at Tower Hamlets

As Tower Hamlets operates the Directly Elected Mayor system, **Mayor John Biggs** holds Executive powers. The Mayor has appointed nine Councillors to advise and support him and they, with him, form the Cabinet. Their details are set out on the front of the agenda.

Which decisions are taken by Cabinet?

Executive decisions are all decisions that aren't specifically reserved for other bodies (such as Development or Licensing Committees). In particular, Executive Key Decisions are taken by the Cabinet or by the Mayor as Individual Mayoral Decisions.

The constitution describes Key Decisions as an executive decision which is likely

- a) to result in the local authority incurring expenditure which is, or the making of savings which are, above £1million; or
- b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the borough.

Upcoming Key Decisions are published on the website on the 'Forthcoming Decisions' page through www.towerhamlets.gov.uk/committee

Published Decisions and Call-Ins

Once the meeting decisions have been published, any 5 Councillors may submit a Call-In to the Service Head, Democratic Services requesting that a decision be reviewed. This halts the decision until it has been reconsidered.

- The decisions will be published on: **Thursday, 17 December 2020**
- The deadline for call-ins is: **Thursday, 24 December 2020**

Any Call-Ins will be considered at the next meeting of the Overview and Scrutiny Committee. The Committee can reject the call-in or they can agree it and refer the decision back to the Mayor, with their recommendations, for his final consideration.

Public Engagement at Cabinet

The main focus of Cabinet is as a decision-making body. However there is an opportunity for the public to contribute through making submissions that specifically relate to the reports set out on the agenda.

Members of the public may make written submissions in any form (for example; Petitions, letters, written questions) to the Clerk to Cabinet (details on the previous page) by 5 pm the day before the meeting.

Cabinet

Wednesday, 16 December 2020

5.30 p.m.

- | | Pages |
|--|----------------|
| 1. APOLOGIES FOR ABSENCE | |
| <p>To receive any apologies for absence.</p> | |
| 2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS AND OTHER INTERESTS | 9 - 10 |
| <p>Members are reminded to consider the categories of interest, identified in the Code of Conduct for Members to determine; whether they have an interest in any agenda item and any action they should take. For further details, see the attached note from the Monitoring Officer.</p> <p>Members are also reminded to declare the nature of the interest at the earliest opportunity and the agenda item it relates to. Please note that ultimately it is the Members' responsibility to identify any interests and also update their register of interests form as required by the Code.</p> <p>If in doubt as to the nature of an interest, you are advised to seek advice prior to the meeting by contacting the Monitoring Officer or Democratic Services.</p> | |
| 3. UNRESTRICTED MINUTES | 11 - 22 |
| <p>The unrestricted minutes of the Cabinet meeting held on Wednesday 25 November are presented for approval.</p> | |
| 4. ANNOUNCEMENTS (IF ANY) FROM THE MAYOR | |
| 5. OVERVIEW & SCRUTINY COMMITTEE | |
| 5.1 Chair's Advice of Key Issues or Questions | |
| <p>Chair of Overview and Scrutiny Committee (OSC) to report on any issues raised by the OSC in relation to unrestricted business to be considered.</p> | |
| 5.2 Any Unrestricted Decisions "Called in" by the Overview & Scrutiny Committee | |
| <p>(Under provisions of Section 30, Rule 59 of the Constitution).</p> | |



6. UNRESTRICTED REPORTS FOR CONSIDERATION

6 .1	Land at Malcolm and Mantus Road; disposal to Tower Hamlets Community Housing	23 - 34
<p>Report Summary: The report proposes that an area of Council owned land is sold to Tower Hamlets Community Housing on a long lease in order to facilitate its future development for housing.</p> <p>Wards: Bethnal Green Lead Member: Mayor Corporate Priority: A borough that our residents are proud of and love to live in</p>		
6 .2	Adoption of the High Density Living Supplementary Planning Document	35 - 372
<p>Report Summary: The High Density Living SPD provides supplementary guidance on the design of high density residential and mixed use development as set out in the new Local Plan to 2031 (adopted January 2020), in particular policy S.DH1- Delivering High Quality Design and policy D.DH7 - Density. Furthermore, the SPD seeks to help to deliver the Mayor's manifesto pledges to improve the quality and fairness of housing and make development work for local people. The High Density Living SPD has been through an extensive preparation process that includes project scoping (April 2018-July 2018); evidence gathering -including a large resident survey, workshops and interviews with residents, Council services and other stakeholders- (from August 2018-January 2019); preparation of draft document (February 2019-July 2019); option testing (September-December 2019) and public consultation (February 2020-June 2020). A wide range of community groups, residents, developers and other stakeholders made formal responses to the High Density Living SPD as part of the consultation process. It is now necessary to adopt the High Density Living SPD to further enable clear and robust guidance to inform and be implemented in development proposals which will ensure the quality of life of residents in high-density developments is delivered and in accordance with corporate and Council objectives and the development Plan (Local Plan and London Plan).</p> <p>Wards: All Wards Lead Member: Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Planning Corporate Priority: TH Plan 3: Strong, resilient and safe communities</p>		



6 .3 Spitalfields Neighbourhood Plan – Validation of Submission **373 - 692**

Report Summary:

The Spitalfields Neighbourhood Plan was formally submitted for consideration by the Council on 30 October 2020. The Council is now required to assess the submission against the statutory requirements for neighbourhood plan submissions, and decide whether the plan should be put forward for further consultation and examination. The Council is not required at this stage to make an assessment of the suitability of the plan for adoption by the Council.

Wards: Spitalfields & Banglatown; Weavers
Lead Member: Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Planning
Corporate Priority: A borough that our residents are proud of and love to live in

6 .4 Local Government and Social Care Ombudsman, Determination of Outcome **693 - 710**

Report Summary:

The Local Government and Social Care Ombudsman issued a Report finding fault with the way in which Mrs B’s application for a Personalised Disabled Bay for her son was dealt with by the council. The Ombudsman found there was significant fault in the handling of Mrs B’s case causing her injustice.

The Council is in agreement with the Ombudsman recommendations and has taken steps to remedy the injustice these faults can cause disabled people.

Wards: All Wards
Lead Member: Cabinet Member for Environment and Public Realm (Job Share) - Lead on Environment
Corporate Priority: A borough that our residents are proud of and love to live in

6 .5 2021-22 Budget Consultation Outcome **711 - 756**

Report Summary:

This report presents the outcome of the 2021-22 budget consultation with businesses, residents and key stakeholders.

This will help inform decision making for the Council’s 2021-24 Medium Term Financial Strategy (MTFS).

Wards: All Wards
Lead Member: Cabinet Member for Resources and the Voluntary Sector
Corporate Priority: All Priorities

Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

7. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT

8. EXCLUSION OF THE PRESS AND PUBLIC

Should the Mayor in Cabinet consider it necessary, it is recommended that the following motion be adopted to allow consideration of any exempt/restricted documents.

“That, under the provisions of Section 100A of the Local Government Act, 1972 as amended by the Local Government (Access to Information) Act, 1985, the Press and Public be excluded from the remainder of the meeting for the consideration of the Section Two business on the grounds that it contains information defined as Exempt in Part 1 of Schedule 12A to the Local Government, Act 1972”.

EXEMPT/CONFIDENTIAL SECTION (PINK)

The Exempt / Confidential (Pink) Committee papers in the Agenda will contain information, which is commercially, legally or personally sensitive and should not be divulged to third parties. If you do not wish to retain these papers after the meeting, please hand them to the Committee Officer present.

9. EXEMPT / CONFIDENTIAL MINUTES

Nil items.

10. OVERVIEW & SCRUTINY COMMITTEE

10.1 Chair's Advice of Key Issues or Questions in Relation to Exempt / Confidential Business

Chair of Overview and Scrutiny Committee (OSC) to report on any issues raised by the OSC in relation to exempt/confidential business to be considered.

10.2 Any Exempt / Confidential Decisions "Called in" by the Overview & Scrutiny Committee

(Under provisions of Section 30, Rule 59 of the Constitution).

11. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION

Nil items.

12. ANY OTHER EXEMPT/ CONFIDENTIAL BUSINESS CONSIDERED TO BE URGENT



Next Meeting of the Committee:

Wednesday, 6 January 2021 at 5.30 p.m. in Online 'Virtual' Meeting -
<https://towerhamlets.public-i.tv/core/portal/home>



Agenda Item 2

DECLARATIONS OF INTERESTS AT MEETINGS– NOTE FROM THE MONITORING OFFICER

This note is for guidance only. For further details please consult the Code of Conduct for Members at Part C, Section 31 of the Council's Constitution

(i) Disclosable Pecuniary Interests (DPI)

You have a DPI in any item of business on the agenda where it relates to the categories listed in **Appendix A** to this guidance. Please note that a DPI includes: (i) Your own relevant interests; (ii) Those of your spouse or civil partner; (iii) A person with whom the Member is living as husband/wife/civil partners. Other individuals, e.g. Children, siblings and flatmates do not need to be considered. Failure to disclose or register a DPI (within 28 days) is a criminal offence.

Members with a DPI, (unless granted a dispensation) must not seek to improperly influence the decision, must declare the nature of the interest and leave the meeting room (including the public gallery) during the consideration and decision on the item – unless exercising their right to address the Committee.

DPI Dispensations and Sensitive Interests. In certain circumstances, Members may make a request to the Monitoring Officer for a dispensation or for an interest to be treated as sensitive.

(ii) Non - DPI Interests that the Council has decided should be registered – (Non - DPIs)

You will have 'Non DPI Interest' in any item on the agenda, where it relates to (i) the offer of gifts or hospitality, (with an estimated value of at least £25) (ii) Council Appointments or nominations to bodies (iii) Membership of any body exercising a function of a public nature, a charitable purpose or aimed at influencing public opinion.

Members must declare the nature of the interest, but may stay in the meeting room and participate in the consideration of the matter and vote on it **unless:**

- A reasonable person would think that your interest is so significant that it would be likely to impair your judgement of the public interest. **If so, you must withdraw and take no part in the consideration or discussion of the matter.**

(iii) Declarations of Interests not included in the Register of Members' Interest.

Occasions may arise where a matter under consideration would, or would be likely to, **affect the wellbeing of you, your family, or close associate(s) more than it would anyone else living in the local area** but which is not required to be included in the Register of Members' Interests. In such matters, Members must consider the information set out in paragraph (ii) above regarding Non DPI - interests and apply the test, set out in this paragraph.

Guidance on Predetermination and Bias

Member's attention is drawn to the guidance on predetermination and bias, particularly the need to consider the merits of the case with an open mind, as set out in the Planning and Licensing Codes of Conduct, (Part C, Section 34 and 35 of the Constitution). For further advice on the possibility of bias or predetermination, you are advised to seek advice prior to the meeting.

Section 106 of the Local Government Finance Act, 1992 - Declarations which restrict Members in Council Tax arrears, for at least a two months from voting

In such circumstances the member may not vote on any reports and motions with respect to the matter.

Further Advice contact: Asmat Hussain, Corporate Director, Governance and Monitoring Officer,
Tel: 0207 364 4800.

APPENDIX A: Definition of a Disclosable Pecuniary Interest

(Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, Reg 2 and Schedule)

Subject	Prescribed description
Employment, office, trade, profession or vacation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by the Member in carrying out duties as a member, or towards the election expenses of the Member. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	Any tenancy where (to the Member's knowledge)— (a) the landlord is the relevant authority; and (b) the tenant is a body in which the relevant person has a beneficial interest.
Securities	Any beneficial interest in securities of a body where— (a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and (b) either— (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

LONDON BOROUGH OF TOWER HAMLETS

MINUTES OF THE CABINET

HELD AT 5.35 P.M. ON WEDNESDAY, 25 NOVEMBER 2020

ONLINE 'VIRTUAL' MEETING - [HTTPS://TOWERHAMLETS.PUBLIC-I.TV/CORE/PORTAL/HOME](https://towerhamlets.public-i.tv/core/portal/home)

Members Present:

Mayor John Biggs	
Councillor Sirajul Islam	(Statutory Deputy Mayor and Cabinet Member for Housing)
Councillor Rachel Blake	(Deputy Mayor and Cabinet Member for Adults, Health and Wellbeing)
Councillor Asma Begum	(Deputy Mayor and Cabinet Member for Community Safety, Youth and Equalities)
Councillor Sabina Akhtar	(Cabinet Member for Culture, Arts and Brexit)
Councillor Danny Hassell	(Cabinet Member for Children and Schools)
Councillor Candida Ronald	(Cabinet Member for Resources and the Voluntary Sector)
Councillor Motin Uz-Zaman	(Cabinet Member for Work and Economic Growth)
Councillor Mufeedah Bustin	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Social Inclusion
Councillor Asma Islam	Cabinet Member for Environment and Public Realm (Job Share) - Lead on Environment
Councillor Eve McQuillan	Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Planning
Councillor Dan Tomlinson	Cabinet Member for Environment and Public Realm (Job Share) - Lead on Public Realm

Other Councillors Present:

Councillor Peter Golds	(Leader of the Conservative Group)
Councillor James King	
Councillor Val Whitehead	

Officers Present:

Jane Abraham	(Housing Project Manager)
Kevin Bartle	(Interim Divisional Director of Finance, Procurement and Audit)
Adam Boey	(Senior Strategy & Policy Manager - Corporate)
Stephen Bramah	(Deputy Head of the Mayor's office)
Terry Bryan	(Service Head (Pupil Access and School Sufficiency))
Andreas Christophorou	(Divisional Director, Communications)
Vicky Clark	(Divisional Director for Growth and Economic Development)
David Courcoux	(Head of the Mayor's Office)
Thorsten Dreyer	(Head of Intelligence and Performance)

Janet Fasan	(Divisional Director, Legal, Governance)
Emily Fieran-Reed	(Senior Strategy and Policy Manager, Communities Team, Corporate Strategy & Policy Strategy, Policy & Performance Division)
Sharon Godman	(Divisional Director, Strategy, Policy and Performance)
Chris Harrison	(Liveable Streets Technical Director)
Dan Jones	(Divisional Director, Public Realm)
Marion Kelly	(Finance Improvement Team - Programme Director)
Christine McInnes	(Divisional Director, Education and Partnerships)
Denise Radley	(Corporate Director, Health, Adults & Community)
James Thomas	(Corporate Director, Children and Culture)
Will Tuckley	(Chief Executive)
Mark Waterman	(Strategy & Policy Manager)
Matthew Mannion	(Head of Democratic Services, Governance)

1. APOLOGIES FOR ABSENCE

Apologies for absence were received on behalf of:

- Asmat Hussain, Corporate Director, Governance and Monitoring Officer for whom Janet Fasan (Divisional Director, Legal Services) was deputising.
- Neville Murton, Corporate Director, Resources, for whom Kevin Bartle, Interim Divisional Director, Finance, Procurement and Audit was deputising.
- Ann Sutcliffe, Corporate Director, Place, for whom Dan Jones, Divisional Director, Public Realm was deputising.

Councillor Dan Tomlinson, Cabinet Member for Environment and Public Realm (Job Share) – Lead on Public Realm apologised that he would need to leave the meeting early.

2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS AND OTHER INTERESTS

There were no Declarations of Disclosable Pecuniary Interest. However, it was noted that a number of Members lived in and/or represented the areas of Bow covered by Agenda Item 6.1 (Liveable Streets Bow Consultation Outcome report). They took part in the discussion of the item.

3. UNRESTRICTED MINUTES

RESOLVED

1. That the unrestricted minutes of the Cabinet meeting held on Wednesday 28 October 2020 be approved and signed by the Chair as a correct record subject to the amendment of Recommendation 2 of Agenda Item 6.8 (Billingsgate Market – Update on Joint Working with the City of London Corporation) to change the date of 27 November 2020 to November 2021.

4. ANNOUNCEMENTS (IF ANY) FROM THE MAYOR

The **Mayor** made a number of announcements including that:

- The Council had published its Violence, Vulnerability and Exploitation Strategy. He also highlighted the 16 days of activism against gender-based violence. This was an extremely important campaign that the Council was supportive of as part of wider efforts to tackle these unacceptable issues and looking to create a fairer, more equitable society.
- Noted the government had announced the Spending Review and the Council would be analysing its impact on the authority.
- He would shortly be signing an Individual Mayoral Decision on providing school meals for children in need over the Christmas holiday period.
- The Covid-19 infection rate may have slowed in the borough but it remained extremely important for residents to act with care in their daily lives. He welcomed the news of successful vaccines.
- He congratulated Mayflower Primary School for being awarded the 'School of the Year' in the Annual Sunday Times list.

5. OVERVIEW & SCRUTINY COMMITTEE

5.1 Chair's Advice of Key Issues or Questions

Pre-Decision Scrutiny Questions and officer responses were tabled in relation to all the reports on the agenda. These were considered during discussion of each relevant agenda item.

In addition, Councillor James King, Chair of the Overview and Scrutiny Committee, provided an update on the Committee's meeting earlier in the week. He reported on a number of discussion items including:

- The presentation from the Mayor and Chief Executive relating to the Council's Strategic Performance Reporting noting both areas of high performance but also highlighted issues such as around Workpath and Youth Justice.
- An update from the Director of Public Health on the Covid-19 Pandemic and the Council's plans in areas such as mass testing. He also thanked the Mayor for his response to the Committee's Covid-19 review report.
- A Spotlight session on Improving Resident Engagement with a particular focus on methods of consultation including the impact of the pandemic.
- That the Committee had agreed a new 'Councillor Call for Action' process to allow issues to be considered where all other avenues for a solution had been exhausted.

The **Mayor** thanked Councillor James King for his update.

5.2 Any Unrestricted Decisions "Called in" by the Overview & Scrutiny Committee

The **Mayor** reported on his response to the call-in of the decision taken at the 23 September 2020 cabinet meeting in relation to Housing Allocations. He explained that he had taken time to fully explore the issues and concerns raised as this was a technical issue.

He highlighted the housing crisis in the area and acknowledged the challenge between providing good options for those in housing needs whilst not also leading to expectations that could not be fulfilled. For example, very few properties became available for those in Band 3.

He explained that he had agreed to reinstate existing housing tenants under the age of 50 to Band 3 of the Common Housing Register and would be retaining the proposal to allow applicants placed out of the borough in private rented accommodation to remain on the housing register for three years.

He welcomed continued scrutiny of the Council's housing allocations policies.

RESOLVED

1. To note the response of the Overview and Scrutiny Committee to the call-in.
2. To agree to reinstate existing social housing tenants under the age of 50 to Band 3 of the Common Housing Register (a change to the original recommendation 3)
3. To retain the proposal to allow applicants placed in out of borough Private Rented Sector accommodation to remain on the housing register for a time-limited three-year period. (as set out in Paragraph 3.3 of the original report)

6. UNRESTRICTED REPORTS FOR CONSIDERATION

6.1 Liveable Streets Bow consultation outcome report

Councillor Dan Tomlinson, Cabinet Member for Environment and Public Realm (Job Share) – Lead on Public Realm, introduced the report updating Cabinet on the outcome of the consultation on Liveable Streets proposals for the Bow area and seeking agreement on a number of recommendations.

He explained that consultation packs had been sent to the 14,000 households in the area. The results showed that a majority of residents in the area were in favour of each part of the scheme. The changes would invest in the area and support work to reduce pollution and improve the general environment. He thanked the officers who have worked had on this project and the ward councillors who had helped with the consultation.

The **Mayor** welcomed the report and the responses to the consultation. He noted the wide range of opinions received. He proposed an amendment to the existing recommendation 3 to further work up the blue badge scheme in relation to the bus gates and report back to Cabinet including looking at exemptions, timings and related matters.

Cabinet then proceeded to hear from a number of residents of Bow who all welcomed the proposals and highlighted the detrimental impact pollution and the dominance of cars on local streets was having on the health and wellbeing of residents.

The Cabinet discussed the report and noted a number of points including:

- Whether the consultation exercise had reached all residents with an explanation of the efforts, including by Ward Councillors, to ensure that happened but also concerns raised by a number of people, including Councillor Peter Golds, Leader of the Conservative Group, at the meeting that the consultation may not have been sufficient.
- It was noted that there were lower levels of BME respondents but that those who did respond had shown a majority in favour.
- The significant increase in traffic over recent years.
- How best to enforce any changes that were agreed.
- The Pre-Decision Scrutiny Questions and officer responses that had been tabled.

In relation to ensuring all viewpoints had been heard, the **Mayor** stated that he would be looking to undertake a Town Hall style meeting in the area to provide another opportunity for views to be expressed.

The reasons for urgency set out in the report were agreed. Namely, that: The report was not published five clear days in advance of the meeting. This is due to the additional time required to review the large volume of appendices and respondents to the consultation. If the outcome of the consultation is not considered at this meeting it will impact of the timely delivery of the scheme and risk potential funding loss from third party sources.

The **Mayor** then proposed the amended recommendations to Cabinet, who voted in turn and it was **agreed** unanimously:

RESOLVED

1. To note and conscientiously consider the results of the engagement to date and public consultation of Bow Liveable Streets (Appendix C & D to the report)
2. To approve the final scheme design for the Bow area as part of the Liveable Streets programme (Appendix B to the report) and summarised in section 3.3 of the report
3. To devise an exemption scheme for consideration in respect of vehicles belonging to designated blue badge holders.

4. To agree that a further report be brought to Cabinet for approval setting out the options for the operation of the Roman Road and Coborn Road bus gate and timed closure including hours of operation and potential exemptions for local blue badge holders, carers and potentially other local groups. The report will additionally explain how changes to exemptions might be made, in a way that is both transparent but responsive, to these or other timed closures.
5. To approve the use of existing frameworks or term contracts to award an order up to a value of £3 Million for the completion of the Works.

6.2 Planning for School Places 2020/21

Councillor Danny Hassell, Cabinet Member for Children and Schools, introduced the report setting out the Council's planning for provision of school places. He thanked the team who had undertaken a huge amount of work to bring this level of confidence to the plans set out. The proposals would support families in accessing good quality education.

The Pre-Decision Scrutiny Questions and officer responses were noted.

The **Mayor** thanked him for the update and proposed the recommendations as set out. These were **agreed** without dissent and it was:

RESOLVED

1. To note the position on the current and projected demand for school places.
2. To note the progress made in relation to:
 - a. the actions being taken to rationalise the primary school provision in the west of the borough where there is surplus;
 - b. the plans and options for future school developments to meet the anticipated need for additional primary places in the east of the borough, including the expansion of existing schools and the development of a new school at Wood Wharf on the Isle of Dogs;
 - c. the development of the new secondary school at London Dock;
 - d. the development of the new secondary school site at Westferry Printworks on the Isle of Dogs;
 - e. the rebuild/refurbish George Green's Secondary School;
 - f. the expansion of Phoenix Special School and the plan for the enlargement of Beatrice Tate Special School.
3. To note the specific equalities considerations as set out in Paragraph 5 of the report.
4. To note that this report sets out the council's plan to exercise its Education functions aligned with the functions of the council as a Local Planning Authority (LPA), and particularly concerning the

approach to the current allocation of school sites in the Local Plan as adopted in January 2020. The council intends to initiate a review of the Local Plan over the course of the next year.

5. To agree to authorise the Corporate Director - Place to enter into the development agreement and the works funding agreement and all other related agreements (including leasing heads of terms if necessary) with the Department For Education in order to access the DFE contribution for the construction of a new secondary school on the London Dock Site.

6.3 Report on the outcome of the preliminary stakeholder consultation (pre-statutory) on the proposal to close St Matthias Primary School.

Councillor Danny Hassell, Cabinet Member for Children and Schools, introduced the report on the outcome of preliminary stakeholder consultation on the closure of St Mathias Primary School. He reported that this was a small school suffering from a falling roll and there was a surplus of places in that part of the borough. It was expected that all pupils could be accommodated in other suitable local schools.

It was therefore proposed that the Council proceed to the statutory consultation stage of the process.

The Pre-Decision Scrutiny Questions and officer responses were noted and the **Mayor** proposed the recommendations as set out. These were **agreed** without dissent and it was:

RESOLVED

1. To agree to move to the publication of a statutory notice for 28 days, in respect of the proposal to close St Matthias CofE Primary School. This will take effect from 31st August 2021, with the displaced pupils admitted to other nearby schools, including a nearby Church of England Primary School.
2. To note the Equalities Assessment set out in Section 4 of the report and attached as Appendix 2 to the report.

6.4 Report on the outcome of the preliminary stakeholder consultation (pre-statutory) on the proposal to close Cherry Trees Special School

Councillor Danny Hassell, Cabinet Member for Children and Schools, introduced the report on the outcome of the preliminary stakeholder consultation into proposals to close Cherry Trees School. He noted that there were only a small number of children on the school roll and that the Council had been looking at its arrangements for specialist support. It was considered that support within mainstream schools had a lot of benefits for the specific children and children more widely.

The **Mayor** acknowledged that the school had fulfilled its purpose for many years but that a different option was now a better solution.

Pre-Decision Scrutiny Questions and officer responses were noted and the **Mayor** proposed the recommendations as set out. These were **agreed** without dissent and it was:

RESOLVED

1. To agree to move to the publication of a statutory notice for 28 days, in respect of the proposal to close Cherry Trees School. This will take effect from 31st August 2021, with the displaced pupils admitted to other specialist provision appropriate to their needs.
2. To note the Equalities Assessment set out in Section 4 of the report and attached as Appendix 2 to the report.

6.5 Voluntary and Community Sector Strategy 2020-23

Councillor Candida Ronald, Cabinet Member for Resources and the Voluntary Sector, introduced the report on the new Voluntary and Community Sector Strategy. She highlighted how important the relationship with voluntary and community sector organisations was to the Council.

The impact of the pandemic had particularly demonstrated this as we had seen organisations reimagining their services to meet the changing demands over the year supporting some of the most vulnerable and socially excluded residents in the borough.

A particular goal for the new strategy was in how to leverage new resources into the sector and how to improve links to all local partners and not just the Council. She welcomed the report and commended the Strategy to Cabinet.

Peter Okali, Chief Executive of Tower Hamlets Council for Voluntary Service welcomed the Strategy and highlighted it had been developed with the full involvement of the sector.

The Cabinet discussed the report noting a number of points including the need to ensure that volunteers were used to support, rather than replace, permanent staff and also on the dangers of over-reliance on private funding sources.

The **Mayor** welcomed the report and stated his pride that the borough had such a large and effective voluntary and community sector. Pre-Decision Scrutiny Questions and officer responses were noted and the **Mayor** moved the recommendation as set out. This was **agreed** without dissent and it was:

RESOLVED

1. To agree the Tower Hamlets Voluntary and Community Sector Strategy 2020-2024, including the actions and outcomes under each priority.

6.6 Quarterly Performance & Improvement Monitoring – Q2 2020/21

During discussion of this item it was agreed under Council Procedure Rule 12.1 (m) to extend the meeting as set out in Rule 9.1 for up to half an hour to conclude the business on the agenda.

The **Mayor** introduced the latest report setting out the Council's quarterly performance monitoring information. He highlighted that the pandemic had caused unexpected difficulties to the authority and, as a result, priorities had to change and not all areas originally identified for monitoring were currently performing in the same way as planned.

However, the report did still demonstrate improvements in a number of areas and also highlighted areas of concern and it was still important to investigate any problems identified.

The **Mayor** noted the Pre-Decision Scrutiny Questions and officer responses and proposed the recommendations

RESOLVED

1. To note the strategic delivery and performance report for quarters 1 and 2 2020/21.
2. To note the performance of the strategic measures, including those measures where the minimum expectation has been missed; and
3. To note progress in delivering the council's Strategic Plan.

6.7 Direct Award to Look Ahead Care and Support for the support contract for Hackney Road, Ministry of Housing, Communities and Local Government funded Homeless Hostel Project.

Councillor Rachel Blake, Deputy Mayor and Cabinet Member for Adults, Health and Wellbeing, introduced the report. She explained that the purpose of the report was to agree capital and revenue funding to Look Ahead Care and Support to provide accommodation and support at their homeless hostel at Hackney Road. This award followed a successful bid for funding from the government. It was noted that capital expenditure included upgrading CCTV to help minimise crime in that area.

The **Mayor** welcomed the report. The Pre-Decision Scrutiny Questions and officer responses were noted and the **Mayor** proposed the recommendation as set out. This was **agreed** without dissent and it was:

RESOLVED

1. To agree the direct award to Look Ahead Care and Support in order to meet the funding conditions of the MHCLG funding bid.

6.8 Approved Capital programme 20/2023 – additional projects

The reasons for urgency as set out in the report were agreed, namely that:

“The report was not published five clear days in advance of the meeting. This is due to the additional time required to confirm the availability of funding sources to finance the additions to the programme and give time for finance and legal comments to be completed. This report seeks budget approvals for programmes, many of which are expected to be delivered in 2020/21, such as Liveable Streets projects, highway maintenance and the buy-back programme for the provision of temporary accommodation. If this report is not considered at this meeting, there will be insufficient time for these programmes to be delivered and this will have a negative impact on local residents.”

Councillor Rachel Blake, Deputy Mayor and Cabinet Member for Adults, Health and Wellbeing (with responsibility for Capital Delivery), introduced the report setting out further projects for approval as part of the 2020-2023 Capital Programme. She explained that these projects had been agreed in principle before but now that funding sources were confirmed they were presented for final sign-off. She recommended this ambitious programme be approved by the Cabinet.

The **Mayor** welcomed the report. He noted the discussion around a number of school and college sites, including the Westferry school site. The Pre-Decision Scrutiny Questions and officer responses were noted. The **Mayor** proposed the recommendations as set out. These were **agreed** without dissent and it was:

RESOLVED

1. To approve the budget allocation of £37.133m for additions to the Approved Capital Programme (Table 3) set out in this report, subject to sign off through the capital governance process, agreement to proceed given by the Corporate Director of Place and Corporate Director of Resources and that schemes funded by future capital receipts, s106 and/or CIL will not go ahead until such funds have been securely received (an appendix will be tabled at CLB).
2. To note the funding sources for the new additions to the Annual Rolling Programme, as set out in paragraph 4.7 of the report.

3. To note the funding sources for the new additions to the Invest to Save programme, as set out in paragraph 4.8 of the report, subject to business cases being approved by the Corporate Director of Place and Corporate Director of Resources.
4. To note the funding sources for the additional schemes being added to the Approved Capital Programme 2020/21 to 2022/23.
5. To approve delegated authority to the Corporate Director of Place and Corporate Director of Resources for all activities required to deliver the additional schemes e.g. go out to tender, appoint consultants and contractors, acquire land interests, appropriate land from the General Fund to the Housing Revenue Account (HRA) for the delivery of new council homes, subject to approved budget.
6. To note that this programme requires a reduction to Year 3 of the Streetlighting Replacement Programme by £0.060m to provide sufficient capital receipts for other priority schemes.

6.9 Community Information Panels – Concession contract update and recommendation

The reasons for urgency set out in the report were agreed (see below). However, the **Mayor** stated that he was not satisfied with reports being completed so close to the Cabinet meeting.

“The report was not published five clear days in advance of the meeting. This is due to the additional time needed to review the appendices in order to provide finance and legal clearance. If the recommendations are not considered at this meeting, this will have an impact in delaying commercial income for the council.”

The **Mayor** introduced the report seeking agreement on a concession contract for Community Information Panels. He highlighted the importance of the report to the Council given it was providing an income stream for the authority from shared advertising space. It was confirmed following questions that a ‘profit share’ arrangement was not seen as providing best value and that the contract provided a clear and consistent income which was seen as the best option.

The Pre-Decision Scrutiny Questions and officer responses were noted as was the exempt appendix which provided more information on the contract arrangements.

The **Mayor** proposed the recommendations as set out. These were **agreed** without dissent and it was:

RESOLVED

1. To approve the changing of the original approval for a contract length of 5 years as agreed in 2018, to a 10 year contract.
2. To approve the recommendations set out in the TG2 report to the procurement advisory board (supplied as an appendix to the report) to award the 10 year CIPS contract to the highest scoring bid at an annual rental of £90,750.

7. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT

Nil items.

8. EXCLUSION OF THE PRESS AND PUBLIC

Nil items.

9. EXEMPT / CONFIDENTIAL MINUTES

Nil items.

10. OVERVIEW & SCRUTINY COMMITTEE

10.1 Chair's Advice of Key Issues or Questions in Relation to Exempt / Confidential Business

Nil items.

10.2 Any Exempt / Confidential Decisions "Called in" by the Overview & Scrutiny Committee

Nil items.

11. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION


Nil items.

12. ANY OTHER EXEMPT/ CONFIDENTIAL BUSINESS CONSIDERED TO BE URGENT

Nil items.

The meeting ended at 9.00 p.m.

MAYOR JOHN BIGGS

<p>Cabinet</p> <p>16 December 2020</p>	
<p>Report of: Ann Sutcliffe, Corporate Director of Place</p>	<p>Classification: Part Exempt</p>
<p>Land at Mantus Road – disposal to Tower Hamlets Community Housing</p>	

Lead Members	Mayor Biggs. Councillor Bustin, Cabinet Member for Planning and Social Inclusion
Originating Officer(s)	Vicky Clark, Divisional Director Growth and Economic Development
Wards affected	Bethnal Green
Key Decision?	Yes
Forward Plan Notice Published	26 October 2020
Reason for Key Decision	Financial Threshold
Strategic Plan Priority / Outcome	<ol style="list-style-type: none"> 1. People are aspirational, independent and have equal access to opportunities; 2. A borough that our residents are proud of and love to live in; 3. A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.

Executive Summary

The Council owns a piece of land at Mantus Road to the south of, and parallel to, a railway line and which was formerly used as an access road ('the Land'). It is immediately to the north of the Bancroft Estate. A second strip of land between Mantus Road and the railway line is held on a long lease by Tower Hamlets Community Housing (THCH). THCH has planning permission for a residential development of the combined sites. The report proposes that the Land is sold to THCH on a long lease in order to facilitate its future development for housing.

Exempt Information

By virtue of section 100A of the Local Government Act 1972 and paragraph 3 of Schedule 12A of the Local Government Act 1972, an appendix in this report is

exempt as it contains Information relating to the financial or business affairs of any particular person (including the authority handling the information). Specifically, the appendix contains land valuation information; the premature publication of this information could prejudice the Council in negotiating the terms of transaction. In all the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the appendix as it could jeopardise the Council's financial position when negotiating the transaction with the developer.

Recommendations:

The cabinet is recommended to;

1. Agree that the Land shown on the plan in Appendix 1, is surplus to the Council's requirements and approve disposal to Tower Hamlets Community Housing (THCH) on a long lease at a peppercorn rent, subject to a premium payment.
2. Agree the main terms of the transaction as summarised at paragraph 3.7 and at exempt Appendix 2.
3. Delegate authority to the Corporate Director of Place to agree minor variations to the terms and to agree any other terms necessary to conclude the agreement with THCH, including the grant of rights of access across the Council's retained land.
4. Delegate authority to the Corporate Director of Place to agree the grant of licences to THCH to carry out any works associated with the development on the Council's retained land and for the temporary use of the Council's land to facilitate the construction of a development.
5. Authorise the Corporate Director of Place to agree to any minor variations to the boundaries of the Land to be sold, in order to implement the recommendations above.
6. Authorise the Corporate Director of Place in liaison with the Corporate Director of Governance to enter into the necessary legal agreements required to implement the recommendations above
7. Agree to consider the information at Appendix 2 as exempt under the provisions of section 100A, and paragraph 3 of Schedule 12A of the Local Government Act 1972.

1 REASONS FOR THE DECISIONS

- 1.1 The transaction will enable a narrow strip of Council land, which would be difficult to develop in isolation, to be redeveloped for housing.
- 1.2 The Council will obtain a capital receipt in exchange for the transfer of its land

on a long leasehold basis.

2 ALTERNATIVE OPTIONS

- 2.1 The two main alternative options are to retain the Land in its existing state, or consider alternative uses for the Land in isolation from the adjoining THCH land.
- 2.2 In respect of the first option, no decision would need to be taken by the Council at this stage and future opportunities may arise. However, the current state of the Land is not benefiting the local environment, it has been subject to anti-social behaviour and is vulnerable to fly-tipping.
- 2.3 For the second option, the Land is vacant and could potentially be developed for a use supporting the neighbouring estate, such as amenity land or play space. However, there are no scheme proposals of this sort and any scheme would involve capital and revenue costs. The shape and size of the Land limits alternative uses, and it would be very difficult to take forward a built development in isolation.
- 2.4 In either alternative option, the current opportunity to facilitate new housing provision in partnership with THCH would be lost.

3 DETAILS OF THE REPORT

- 3.1 The Council owns the Land which is principally a strip of land at Mantus Road, of approximately 2,300 square metres in area (0.57 acres). A location plan is attached at Appendix 1. The main area of the Land was formerly used as a road, which ran along the northern edge of the Bancroft Estate. It is permanently closed at its eastern end and closed to vehicles with gates at its western end. The area has been subject to anti-social behaviour and is vulnerable to fly tipping and the Council has installed CCTV cameras covering the land. The Land runs parallel to land to the north owned freehold by Network Rail, which has been sold on long leases to THCH. The Land also includes a small area to the west of Malcolm Road, and is held in the HRA.
- 3.2 THCH plans to redevelop the combined sites for housing. Given the physical limitations of the THCH land alone, it was considered that a reasonable residential development scheme was not possible without the inclusion of the Council's land.
- 3.3 The whole development site (comprising both THCH and Council ownerships) is a strip of land, extending to around 4,700 square metres (1.17 acres) that runs along the southern side of the railway line. The site is split by Malcolm Road, which runs north to south and under the adjacent railway line.
- 3.4 A planning permission for a residential development was granted on 1 April 2016. The consent is for "redevelopment to provide 93 residential units in buildings ranging from three to six storeys including amenity space,

landscaping, disabled car parking and cycle parking.” An associated listed building consent was granted for use of the railway arches to provide the cycle storage. The scheme provides 33% affordable housing. The consent has been implemented in planning terms and therefore remains valid as confirmed by a lawful development certificate issued on 8 August 2019. THCH may choose to continue with developing out the permitted scheme, propose amendments or submit an application for a new scheme. A new application would be assessed against policies in the Council’s current Local Plan, adopted London Plan and emerging draft London Plan.

- 3.5 The development of the land has been under discussion and the subject of numerous proposals over a long period. THCH took two leases from Network Rail of its land in 2011. The planning application for the consented scheme was made in August 2012.
- 3.6 In 2014, the Council contemplated transferring the Land at nil value to THCH to enable a scheme to progress. However, this approach would not meet best value requirements and it did not proceed. Any scheme will have a high level of abnormal development costs due to the proximity of the railway line, ground conditions and design, because of the elongated nature of the site.
- 3.7 Negotiations with THCH in respect of the terms under which the Land is sold to facilitate a development have been substantially concluded, such that a formal decision is now appropriate. The main elements are set out below and key commercial points are included at exempt appendix 2.
- **Tenure.** The Council will grant a 250-year lease of the Land to THCH.
 - **Premium.** THCH will pay a premium of the sum set out in Appendix 2, payable in two instalments. The first on completion of the lease and the second a year later.
 - **Affordable housing.** Any new or amended scheme for the site will include at least the same amount of affordable housing as in the consented scheme.
 - **Buy back.** If a development is not commenced within five years, the Council will have an option to buy back the Land for the purchase price, plus indexation and a proportion of the costs incurred by THCH in pursuing a development scheme.
 - **Pre-emption.** If THCH wishes to sell the site, the Council will have a right to match the offer and undertake the purchase.
 - **Clawback.** If THCH sells the site, the Council will receive a payment of a proportion of the uplift in value from a base figure, comprising the site purchase costs and costs incurred in taking forward the development of the site.
 - **Overage.** An overage calculation will be carried out on the completion of a development. The calculation will establish a figure representing any surplus that has been achieved, comparing the value of the completed scheme against the costs involved, including a return for the developer. The Council will then be paid a proportion of any such surplus.
 - **Costs.** Each party is to bear its own costs in the transaction.

- **Access rights.** Access to the development site will be required across the Council's estate to the south, for both vehicles and pedestrians. A number of estate access roads lead on to the site. The details of the rights involved remain to be agreed. The rights would need to be capable of change if the development scheme changes and, in the long term, should the Council wish to undertake any development on its land. The use of rights would be subject to a payment of a fair proportion of the costs involved in maintenance. It is proposed that agreement of the detailed provisions on this issue is delegated to the Corporate Director.
- **Underground refuse store (URS).** There is a small area of land to the west of Malcolm Road, separate from the main development site, which is proposed to be used for a URS. A tenure arrangement is proposed for this area allowing the Council an ability to move the location of the URS in the future, subject to meeting the costs involved.
- **Construction phase licences.** The development will require temporary use of the Council's retained land for a variety of possible purposes, including access, storage and site facilities. The details of these requirements will depend on a construction plan to be developed prior to that phase commencing. As such they are not known at this stage.
- **Works licence.** The consented scheme involves THCH carrying out certain work, mostly landscaping, on the Council's retained land. Licences will be required to allow THCH to take possession and complete these works, or any such works as may be linked to an amended or new scheme. It is proposed that future agreement of all the necessary licences is delegated to the Corporate Director.

3.8 In the negotiations of the terms, the Council has been advised by consultant valuers, Gerald Eve. The Land is held in the HRA and does not include any existing dwellings. By virtue of its ownership of adjoining land, THCH has the status of a special purchaser under the Council's disposal protocol. The Council's land has a higher value as part of the proposed scheme than it would have in isolation. On this basis, negotiations with THCH have proceeded on an exclusive basis. In accordance with the General Disposal Consent 2013, Council is able to sell the Land at any consideration that it wishes. A letter from Gerald Eve dated 16 November confirms that the terms agreed represent best consideration and are a reasonable basis on which to proceed.

3.9 On 26 July 2019, the Council wrote to the Chair of Bancroft TMO consulting on the transfer of HRA land to THCH to develop 93 flats. The TMO was given 30 days to respond to the consultation. The TMO's response of 14 August 2019 covered a number of areas, some of which have been dealt with and some of which will be dealt with once development gets underway. Examples included:

- Concerns about the perceived loss of land and playground to the development. This land is not being disposed of and will be landscaped.

- Car parking and monitoring of – the new scheme is car free. A Traffic Management Order can be introduced to ensure compliance.
- Play area – THCH will contribute funding for the upgrading of this.
- Upkeep of communal estate costs such as ground maintenance – this will be subject to further discussion between THCH and BTMO.

3.10 Prior to the start of work THCH, THH and the Council will meet BTMO to discuss estate management during and post construction covering matters such as site access, vehicle cleaning facilities, access for refuse vehicles etc. The details of this will be drawn up in conjunction with Planning to satisfy any planning conditions

3.11 Once the lease is granted, THCH will be able to take forward the implementation of the consented scheme in accordance with its programme or to pursue an alternative development strategy within the terms of the lease.

4 EQUALITIES IMPLICATIONS

4.1 There are no specific equalities implications arising from the decision to dispose of the land. The subsequent development will result in the provision of new residential accommodation, including affordable units. This accommodation will therefore help to meet the demand in the borough from people on the housing waiting list in recognised housing priority need.

5 OTHER STATUTORY IMPLICATIONS

5.1 Best Value. Asset Management officers confirm that this transaction represents market value for the sale of the Council land.

5.2 Risk Management. The risks surrounding this transaction for the Council will be managed through the detailed drafting of the legal agreements. The principal development risks are being borne by THCH and its contractors. The payment of overage to the Council is dependent on the outturn economics of the scheme and there is a risk that no payment may be triggered.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

6.1 The report is recommending the disposal of land at Mantus Road to THCH for development and the delivery of housing. The Council will receive a capital receipt from this land sale. The land is currently held in the HRA. Despite this there is no ringfence around the future use of the capital receipt received.

6.2 The sale price detailed in Appendix 2 is deemed to represent the best consideration for this land. The Council's consultant valuers, Gerald Eve have advised that the disposal price represents best consideration. In its current state the land has no existing use value and therefore it is recommended that this sale price is accepted.

- 6.3 The Council can offset all of its costs incurred in disposing of the land at Mantus Road against the capital receipt. There is no percentage cap within the HRA nor any rental stream that will be affected by the sale of this land. This disposal will therefore have no revenue implications.
- 6.4 The Council has negotiated clawback and overage payments should the site or any of the development be sold at future dates. These will require monitoring to ensure the Council claims any amounts owed in the future.

7 COMMENTS OF LEGAL SERVICES

Disposal Powers

- 7.1 The Council has the power by virtue of section 123 of the Local Government Act 1972 to dispose of land in any manner that it may wish, subject to the general requirement to obtain either best consideration or Secretary of State consent. Section 32 Housing Act 1985 states that a local authority may not dispose of any land held by them without the consent of the Secretary of State. In order to facilitate the disposal of land held for housing purposes the Secretary of State issued a series of general consents, which permit the disposal of land held for housing purposes without the need to obtain express consent. The consents are collectively known as The General Housing Consents 2013.
- 7.2 In accordance with paragraph A.2.2 of the General Housing Consents a disposal includes the grant of a lease of any duration. Paragraph A3.1.1 permit local authorities to dispose of land or dwelling at market value. "Market value" is **defined** in the General Consent as "the amount for which a property would realise on the date of the valuation on a disposal between a willing buyer and a willing seller in an arm's-length transaction after proper marketing where the parties had each acted knowledgeably, prudently, and without compulsion and where the market value is assessed not earlier than 3 months before the buyer applies or agrees to an offer in writing". A letter from Gerald Eve (referred to at para 3.9) and also comments from Asset Management Officers (para 5.1) confirm that this transaction represents market value. The letter uses the terms 'best consideration' and 'market value' interchangeably but the report is clear that the transaction represents market value '*along with representing the best consideration available to the Council for the property, the proposed terms of £1,300,000 plus overage represents the Market Value of the property – page 18*'. Therefore specific consent of the Secretary of State should not be required to effective the proposed disposal which will be at market value.
- 7.3 There will be provisions within the legal agreement to encourage development, including clawback, overage and an option for the Council to buy-back the land (where development has not commenced within a defined period).

Best Value Duty

- 7.4 Section 3 Local Government Act 1999 requires an authority "to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness" ("the best value duty").
- 7.5 The arrangement proposed in this report supports the Council's best value duty. The proposal represents an efficient and effective use of the Council's estate. Where an asset has been identified as surplus to requirements, the Council has the option to retain the asset for future use (and in the meantime to pay any costs associated with maintaining and securing the asset) or to sell the asset for a capital receipt. In this case, the land is subject to anti-social behaviour and fly tipping. The Council has installed CCTV at a cost to the Council and currently generates no income. By disposing of the site, the Council will receive a capital receipt from the sale and the land will be used to deliver a percentage of affordable housing.

Environment

- 7.6 The Council's land subject to anti-social behaviour and fly tipping, which will cease once redevelopment takes place. Any redevelopment will be of a high standard of energy efficiency and built to high environmental standards.

Equalities Implications

- 7.7 The Council is required when exercising its functions to comply with the duty set out in section 149 of the Equality Act 2010, namely to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity between those who share a protected characteristic and those who do not, and foster good relations between those who share a protected characteristic and those who do not. There are no direct equality implications arising from the proposed transactions.

Linked Reports, Appendices and Background Documents

Linked Reports

- None.

Appendices

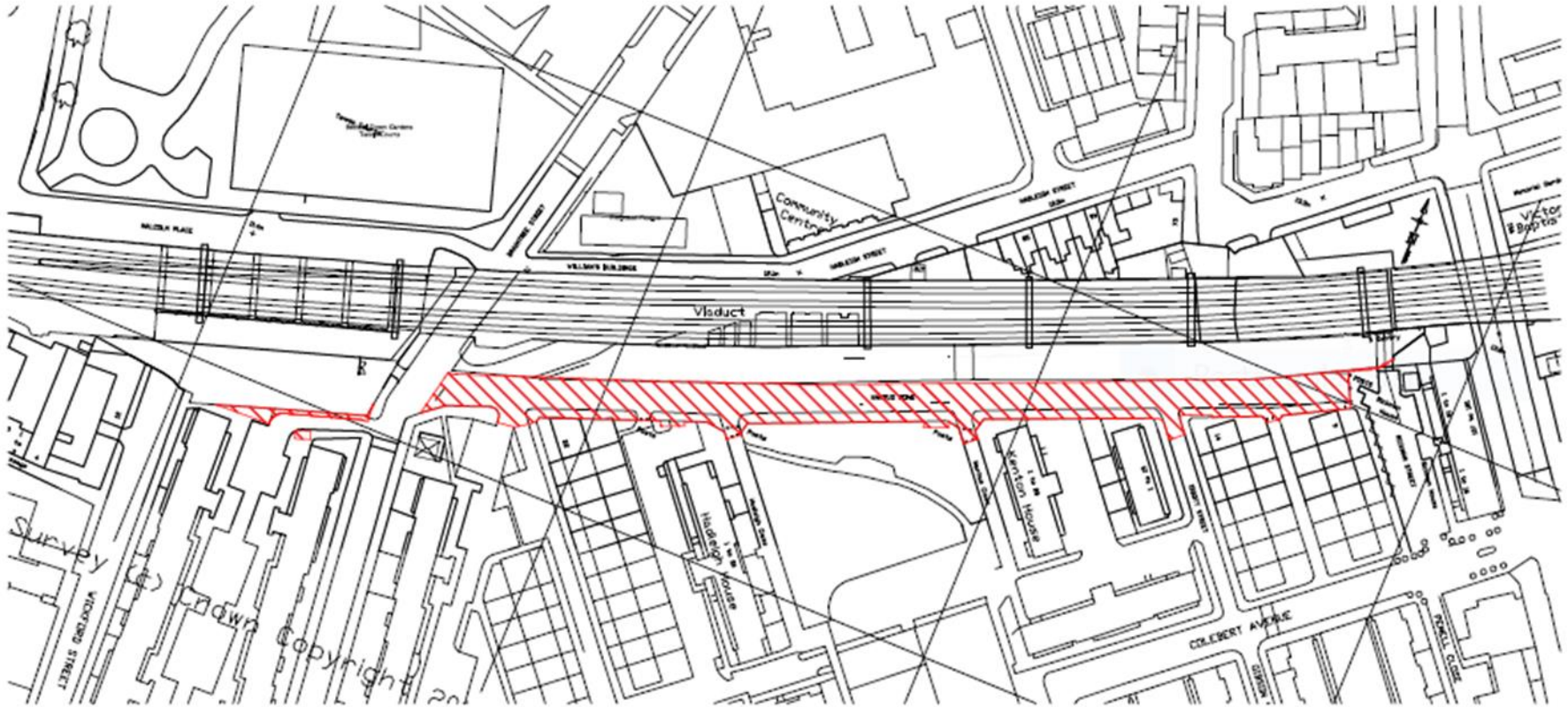
- Appendix 1. Location plan.
- Exempt Appendix 2

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None.

Officer contact details for documents:

N/A




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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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<p>REVISED Cabinet Report</p> <p>16th December 2020</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Ann Sutcliffe, Place Corporate Director</p>	<p>Classification: Unrestricted</p>
<p>Adoption of the High Density Living Supplementary Planning Document</p>	

Lead Member	Councillor Eve McQuillan, Cabinet Member for Planning and Social Inclusion
Originating Officer(s)	Lucia Cerrada Morato
Wards affected	All wards
Key Decision?	Yes/No
Forward Plan Notice Published	17 th November
Reason for Key Decision	Impact on Wards
Strategic Plan Priority / Outcome	A borough that our residents are proud of and love to live in

Executive Summary

The High Density Living SPD provides supplementary guidance on the design of high density residential and mixed use development as set out in the new Local Plan to 2031 (adopted January 2020), in particular policy *S.DH1- Delivering High Quality Design* and policy *D.DH7 - Density*. Furthermore, the SPD seeks to help to deliver the Mayor’s manifesto pledges to improve the quality and fairness of housing and make development work for local people.

The High Density Living SPD has been through an extensive preparation process that includes project scoping (April 2018-July 2018); evidence gathering -including a large resident survey, workshops and interviews with residents, Council services and other stakeholders- (from August 2018-January 2019); preparation of draft document (February 2019-July 2019); option testing (September-December 2019) and public consultation (February 2020-June 2020). A wide range of community groups, residents, developers and other stakeholders made formal responses to the High Density Living SPD as part of the consultation process.

It is now necessary to adopt the High Density Living SPD to further enable clear and robust guidance to inform and be implemented in development proposals which will ensure the quality of life of residents in high-density developments is delivered and

in accordance with corporate and Council objectives and the development Plan (Local Plan and London Plan).

Recommendations:

Cabinet is recommended to:

1. To approve the High Density Living SPD (appendix 1) for adoption and authorise officers to prepare an adoption statement and publish the Regulation 18(4)(b) Statement and adoption statement so it can be considered a material planning consideration in the assessment of planning applications for high density and high-rise buildings.
2. Authorise the Corporate Director of Place to make any necessary factual or minor editing changes prior to publishing the final High Density Living SPD.
3. To note the Equalities Impact Assessment as set out in appendix 2.
4. To note the Representation schedule summarising representations received during the consultation and the responses to these representations as set out in appendix 3.
5. To note the Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report and consultation responses attached in appendix 4.

1 REASONS FOR THE DECISIONS

- 1.1 Tower Hamlets has the highest housing target under in the current London Plan and this has been only moderately reduced in the new draft London Plan. With limited land available for new development, significant emphasis has been placed on optimising housing density to deliver sufficient new homes. Increasingly, planning policy and guidance has supported the delivery of housing at high densities. This narrative has continued in the draft London Plan, which unlike its predecessor does not set out target density ranges, and instead leaves upper density levels open, allowing boroughs to determine the appropriate development in the context of their existing character and densities.
- 1.2 The new Tower Hamlets Local Plan sets out how the borough will grow and develop from now until 2031. It recognises that during this time Tower Hamlets will continue to be home to diverse communities and that it is important to support existing residents and welcome new people to make

their home within liveable, mixed, stable, inclusive and cohesive neighbourhoods, which contribute to a high quality of life. Among the many policies that will shape new development is one that seeks to manage the impacts of high density developments. This supports the Mayor of Tower Hamlets' manifesto commitment to continue to oppose development that is too tall or too dense.

- 1.3 The density of development has two important implications; it influences the number of people living in an area and it influences the nature of the urban form in which they are accommodated. Tower Hamlets has a rapidly growing population, with up to 400,000 new residents expected by 2031. However the land available for new development is decreasing. The borough has already undergone significant development in recent years limiting the number of sites that are available for redevelopment and intensification. This growth inevitably will result in an increase in residential densities that will focus in particular areas of the borough, such as the City Fringe, parts of the Isle of Dogs and Poplar Riverside. Increased densities will also mean that this growing population will be accommodated in a changing landscape of built form, particularly one that features an increased number of tall buildings. The Local Plan seeks to manage some of the implications of these changes, however given the cumulative number of high density developments it was agreed that a more detailed knowledge of the experiences of those who live in high density developments was necessary in order to understand how we can ensure new development provides a good and sustainable quality of life.
- 1.4 Evidence gathered through surveys and interviews pointed to important design issues that impact residents' quality of life. The High Density Living Supplementary Planning Document provides a series of design recommendations to support residents' quality of life.

2 ALTERNATIVE OPTIONS

- 2.1 The new Local Plan provides a vision and strategic development principles for residential and tall buildings (among other policy themes and spatial guidance). An alternative option would be to rely on this document to support and guide the development and assessment of high density and high-rise buildings in the Borough, without further detailed design guidelines.
- 2.2 This option was considered inadequate as it would not provide a sufficiently detailed understanding of the implications of high density and high-rise developments on resident's quality of life. Without the additional design guidelines provided by the SPD, the Local Plan does not provide in itself the

necessary level of detail to secure exceptional architectural quality and innovative and sustainable building design.

3 DETAILS OF THE REPORT

Background

- 3.1 The Strategic Planning service has prepared a Supplementary Planning Document (SPD) that provides additional guidance on the design of high density residential and mixed use development. The SPD supports the new Local Plan to 2031, in particular policy S.DH1 - Delivering high quality design and policy D.DH7 - Density. The project helps to deliver the Mayor's manifesto pledges to improve the quality and fairness of housing and make development work for local people. This responds to the National Planning Policy Framework (NPPF) and new London Plan, and has been prepared and will be adopted in accordance with the provisions in the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.2 The project responds to important recent changes in national and regional policy. Firstly, the significant emphasis that the new London Plan places on optimising housing density to deliver sufficient new homes and that, unlike its predecessor, the new London Plan does not set out target density ranges, and instead leaves upper density levels open, allowing boroughs to determine the appropriate development in the context of their existing character and densities. Secondly, the new NPPF and new London Plan place great emphasis on design quality to achieve high quality buildings and places. The NPPF encourages plans and supplementary guidance to provide maximum clarity about design expectations at an early stage through visual tools such as design guidelines. The high density living guidance seeks to provide a clear design vision and set expectations for future development in the borough.
- 3.3 The project's main objective is to ensure that the design of new high density development contributes toward a high-quality of life. It will also enable stakeholders, such as residents, Members, developers and officers, to better understand the role of design in high density residential and mixed-use development.

SPD process

Project scoping and evidence gathering

- 3.4 As part of this work, and in order to inform and provide a robust basis for drafting the supplementary policy, extensive research has been carried out into the design of high density residential development, with a particular focus

on tall buildings as this type is particularly prevalent in the borough. Project scoping and evidence gathering took part between April 2018 and October 2018. This research and evidence gathering builds on work that has already been done, for example the new Local Plan, to respond to significant increases in the density and height of residential and mixed-use planning applications that have come forward in the borough in recent years. As part of the research and evidence base gathering, we;

- 3.5 First, undertook desk-based research in relation to existing policy and relevant evidence to understand and assess potential gaps.
- 3.6 Second, to gather primary data and inform the guidance, evidence was collected through a series of case studies. Case studies were selected across a range of residential densities and a range of building heights, as well as different tenure splits. The case studies were selected from different parts of the borough, and with a range of different building typologies.
- 3.7 Third, to understand the implications of living at high density, a framework against which high density living environments can be assessed was established. This was based on a set of quality of life indicators that were identified by carrying out a review of relevant literature and best practice.
- 3.8 Fourth, using the initial quality of life indicators, research was carried out to ascertain the ways in which the design characteristics of high density living environments impacted on the quality of life of residents across the nine case studies. The data was gathered through a desktop study, a resident survey, resident interviews, site visits, a neighbourhood survey and a desktop study.

In total 732 residents participated in the resident survey. The survey was then followed up with semi-structured interviews with fifty of the respondents to gain a deeper understanding of life in high density living environments. Site visits to the case study schemes, led by the building caretakers, were carried out and detailed observations were recorded. A second survey focused on residents living around the nine case studies, to understand the impact of high density buildings on neighbouring communities. A detailed examination of the planning application drawings and documents for the case study schemes was also carried out. This highlighted that there are a number of challenges on designing high density buildings such as overcoming social isolation, providing good quality play spaces, avoiding overheating in flats, etc.

- 3.9 This research and evidence gathering allowed for a draft or scoping document to be drafted in preparation for engagement and formal consultation.

Further engagement

- 3.10 The project has been informed by extensive engagement, November 2018 until January 2019, with a range of internal and external stakeholders such as ward Members, key public sector agencies, landowners and relevant Council departments. This is an important part of the preparation process, to ensure key issues are identified and resolved at the earliest opportunity. The principal methods of engagement were workshops, interviews, focus groups and sounding board sessions.
- 3.11 Internal stakeholders included a range of council services, such as those with a responsibility for safety, public health, housing and sustainability, public realm, transport and waste, and leisure. External stakeholders such as residents, experts, academics, housing associations, developers, architects and neighbouring local authorities, were also engaged with.
- 3.12 The project was also selected to participate in the GLA's first Social Integration Lab, which gave officers the opportunity to work with social integration experts, public sector innovators and residents to embed social integration principles into the guidance recommendations.

Drafting of document and option testing

- 3.13 The research and engagement outlined above informed the first draft of the design guidance. The drafting process spanned from February 2019 until July 2019.
- 3.14 Through a variety of engagement methods such as briefings, workshops, co-design workshops and various presentations, feedback was sought on options for guidance and recommendations. Some of the stakeholders engaged were Housing Associations, Developers, Services across the Council and built environment experts. Option testing took place between July 2019 and December 2019.
- 3.15 The document was informed by the option testing discussions and finalized between December 2019 and February 2020.

Formal Consultation

- 3.16 Consultation was undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI), the Corporate Handbook and in collaboration with the Communications Team. The public consultation on the draft was designed to test the content of the SPD and also to highlight the lived experiences of residents in high density buildings and high density neighbourhoods. A summary of the consultation methods are:

- Advertisement in the East End Life newspaper
 - Information on the Council's website
 - Series of events and exhibitions between March and April 2020. The events and exhibitions were designed to be accessible and open to everybody and tailored to address a range of audiences.
 - Providing a telephone hotline and email address for queries on the SPD.
- 3.17 The consultation events were planned to take place in three areas; East (Aldgate), West (Bow) and South (Isle of Dogs). These are areas that currently feature high density development and that are expected to see further high density growth in the future. The case studies that informed that guidance are also based in these three areas.
- 3.18 The exhibitions displayed material, including photographs and videos, gathered through interviews and conversations with residents to show the lived experiences in high density environments. These were presented alongside exhibition panels illustrating the content of the SPD. The exhibitions and events were planned to move across the three areas during the consultation period, with two weeks at each area.
- 3.19 Unfortunately due to the Covid-19 pandemic and given the clear government guidance to stay at home and avoid all unnecessary travel all in-person consultation events had to be cancelled after the events in the Aldgate area.
- 3.20 In order to respond to the context and adapt the public consultation the Council undertook the following measures:
- The Consultation was extended by four weeks until the 15th of May
 - All exhibition material was uploaded to the website (including videos and panels)
 - Council invited questions from the public
 - All the measures above were widely publicised through social media (including Facebook, Twitter and LinkedIn) and emails were circulated to the Strategic Planning contact list
 - Extension to the Consultation and other measures were also presented at the Developers Forum
- 3.21 Over 50 people attended the consultation events held by the Council. In addition, 62 written representations were received via email and/or online survey from Members, local residents, statutory consultees, (including, Greater London Authority (GLA), London Thames Gateway Development Corporation (LTGDC), Transport for London (TfL), Environment Agency and English Heritage) landowners and developers.

3.22 The Council has collated the individual comments made on the draft High Density Living SPD and formulated responses to themes (see next section) that have been used to inform the finalisation of the High Density Living SPD. In accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a statement setting out a summary of all of the representations received and the Council's proposed response to them has been appended to this Report, together with the final SPD, for approval.

Overview of Consultation Feedback

3.23 The overarching objectives for the High Density Living SPD to guide the development of good quality high density and high-rise buildings were generally supported by the community and key stakeholders. There was particular support for:

- Child friendly guidelines that seek to provide independent mobility and independent play for children
- Community cohesion policies through how communal amenity spaces are connected and located within the development and in relation to the wider neighbourhood
- Guidelines on how to achieve adaptable homes through careful consideration of flat layouts and storage

3.24 Representations expressed concerns on:

- The document being too lengthy
- Some of the guidelines going beyond the scope of planning
- The lack of clarity on what type of buildings the document applies to
- The lack of clarity on how the document will be used to assess applications
- The cumulative impact on economic viability

3.25 The document has been amended to respond to the representations above. Specifically:

- The document has been streamlined from 132 to 98 guidelines. Guidelines were combined when addressing recommendations for the same space. In doing so hierarchy and clarity on how applicants can achieve good design has been provided. When guidelines repeat or refer to existing guidelines, clear reference has been made. These have been kept in order to provide an holistic view of the policy framework.

- Clarity provided on which guidelines are expected to be met at planning stage and which ones constitute only recommendations after planning consent.
- Introduction amended to clarify to what buildings this document applies. Clearer definition provided of high density and high rise in the context of Tower Hamlets as well as further guidelines on how to calculate density is now provided in the introduction. The introduction also clarifies that this document only applies to residential C3 uses.
- Introduction amended to clarify how the document will be used by different stakeholders. This includes how applicants are to demonstrate their consideration of the SPD in developing their proposal and how officers will use the document throughout the planning application process.
- Clarification on expectations about the compliance of guidelines, such that the applicants are not expected to meet all guidelines but need to prove how they achieve the main objectives of the SPD in supporting residents quality of life. This minimises concerns about cumulative impact on economic viability.

Next Steps

- 3.26 To make any necessary factual or minor editing changes prior to publishing the final High Density Living SPD.
- 3.27 To prepare an Adoption Statement to accompany the High Density Living SPD in accordance with Regulation 11 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Adoption Statement sets out:
- a. date which the High Density Living was adopted; and
 - b. notice that any person with sufficient interest in the decision to adopt the supplementary planning document may apply to the High Court for permission to apply for judicial review of that decision, and
 - c. that any such application must be made promptly and in any event not later than 3 months after the date on which the supplementary planning document was adopted; and.

- 3.28 Subject to Cabinet adopting the High Density Living SPD, both the SPD and an adoption statement, will be finalised and published on the Council's web site and made available in the borough's Idea Stores, libraries and planning reception at the Town Hall. The High Density Living SPD will become a material consideration in the assessment of high density developments.
- 3.29 Under Regulation 11 of The Town and Country Planning (Local Planning) (England) Regulation 2012 section, an application can be made within three months of adoption to the High Court to have a judicial review of that decision. However, we can still put full weight on the policies in the plan during the challenge period. Therefore, following adoption of the High Density Living SPD there will be a statutory three months legal challenge period. The three months will commence from the date of adoption which will be the date of the Cabinet meeting. In the event of such a challenge, a further report will be presented to Cabinet to provide a suitable update on the expected process and associated risks.

4 EQUALITIES IMPLICATIONS

- 4.1 We have completed the Equalities checklist attached as appendix 2.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
 - Consultations,
 - Environmental (including air quality),
 - Risk Management,
 - Crime Reduction,
 - Safeguarding.
 - Data Protection / Privacy Impact Assessment.

- 5.2 No other statutory implications.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 There are no direct financial implications emanating from this report which provides guidance to developers when designing high density development proposals.
- 6.2 The cost of producing the high density living supplementary plan was met from existing budgetary provision and GLA funding.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The Executive (Mayor and Cabinet as defined in section 9(c) of *the Local Government Act 2000*) is authorised to consider the proposed recommendations in this report by virtue of the SPD comprising a 'Key Decision' as defined in Section 3 of the Council's Constitution. Paragraph 6 of Section 3 of the Constitution defines 'Key Decision' as an executive decision which is likely to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions. As stated above in this report, this SPD if implemented will have a significant effect on all wards in the borough as it will comprise a material planning consideration in the assessment of new planning applications for high density and high rise buildings.
- 7.2 The SPD itself is a document defined in regulation 5 of the Town and Country (Local Planning) (England) Regulations 2012 ('the Regulations') to encompass any document prepared by a local planning authority which contains statements (insofar as they relate to this SPD) regarding:
- 7.1.2 the development and use of land which the local planning authority wish to encourage during any specified period; and
- 7.2.2 any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land.
- 7.3 The SPD comprises a category of planning documents, which only supplement the policies in a local plan. Unlike local plans, SPDs are not required to be submitted to independent examination. 2
- 7.4 The SPD has been prepared in accordance with the procedures set out in the Regulations.
- 7.5 Pursuant to s149 of the Equality Act 2010, the Council is under a duty to have due regard to think about the need to:
- 7.5.1 Eliminate unlawful discrimination;
- 7.5.2 Advance equality of opportunity between people who share a protected characteristic and those who don't;
- 7.5.3 Foster or encourage good relations between people who share a protected characteristic and those who don't.
- 7.6 The completed Equalities checklist at Appendix 2 of this report demonstrates the Council's compliance with its public sector equality duty under the Equality Act 2010.

Linked Reports, Appendices and Background Documents

Linked Report

- None.

Appendices

Appendix 1 – High Density Living SPD•

Appendix 2 – Quality Assurance Checklist•

Appendix 3 – Consultation and Engagement.

Appendix 4 (NEW) - Strategic Environmental Assessment and Habitats
Regulation Assessment Screening Report

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- NONE

Officer contact details for documents:

Or state N/A

Supplementary
planning document

HIGH DENSITY LIVING

Consultation draft
February 2020

SECTION 1 HIGH DENSITY LIVING

Introduction

- 9 Introduction overview
- 10 Policy Context
- 12 Status of the document
- 14 How the document was developed
- 15 How to use this document
- 17 Glossary

SECTION 2 TOPIC PAPERS

- 22  Children and young people
- 26  Mixed and balanced communities
- 30  Everyday life
- 34  Buildings as a system
- 38  Healthy neighbourhoods

SECTION 4 TYPOLOGY STUDY

Typology study

Introduction

- 44 Introduction

Stand alone tower

- 46 Outline
- 47 Best practice

Tower on podium

- 48 Outline
- 49 Best practice

Perimeter block

- 50 Outline
- 51 Best practice

Interlinked tower

- 52 Outline
- 53 Best practice

Extruded block

- 54 Outline
- 55 Best practice

SECTION 3 DESIGN RECOMMENDATIONS

1. Around the building

Content Vision

1.1 Quantity

- 84 Introduction
- 85 Existing Policy
- 86 Density implications
- 87 Amenity areas

90 11.2 Urban design

- 94
- 96 Introduction
- Existing policy
- Make streets
- Liveable streets
- 102 Accessibility

103 11.3 Public Uses

- 109
- Introduction
- Existing policy
- Interface

112 11.4 Systems

- 114

116 **Introduction**
 118 **Existing policy**
 120 **Waste**
Water

1.5 Environment

124
 125 **Introduction**
 126 **Existing policy**
 128 **Solar access**
 133 **Wind comfort**
 136 **External thermal comfort**

140
 144
 145 **Communal spaces**

Content
Vision

146
 147.1 **Outdoor**
 148
 152 **Introduction**
 156 **Existing policy**
 158 **Quantity**
Primary space
Secondary space
Design
 162 **Pets**
 163 **Environment**
 164

2.2 Play

Introduction
 168 **Existing policy**
 169 **Design**
 170 **Location**
 174

2.3 Indoor

Introduction
Existing policy
 176 **Location**
 177 **Design**
Flexibility
Facilities

2.4 Circulation

179
 180 **Introduction**
 182 **Existing policy**
Entrances
Lobbies

Lifts and stairs
 184 **Lift lobbies**
 185 **Corridors**
 186 **Doors**
 187 **Environment**

2.5 Systems

188 **Introduction**
 189 **Existing policy**
 190 **Waste disposal system**
Waste room
Water
Energy

192
 193.6 **Cycling**

194
Introduction
Existing policy
Cycle stores

196
 197.7 **Staff facilities**

198
 200 **Introduction**
Existing policy
Staff and contractors
Deliveries

206
 207
 208 **Home**

211
 212 **Content**
Vision

3.1 Entrance

214
 215 **Introduction**
 216 **Existing policy**
 218 **Design**
Storage

3.2 Living/ Kitchen/ Dining

220
 221 **Introduction**
 222 **Existing policy**
 223 **Flexibility**
 224 **Waste**

228
 229.3 **Bathrooms**

Introduction
Existing policy
Design

3.4 Bedrooms

Introduction
Existing policy
Design

3.5 Private amenity space

232 **Introduction**
Existing policy
Orientation
Type

234

3.6 Adaptability

Introduction
Existing policy
236 **Layout**
237 **Laundry**
Storage

3.7 Construction and materials

238

239 **Introduction**
Existing policy
Construction
Materials

240

3.8 Environment

Introduction
Existing policy
242 **Existing standards**
243 **Layout**
Mitigation
Noise
Overlooking and privacy

SECTION 5

APPENDIX

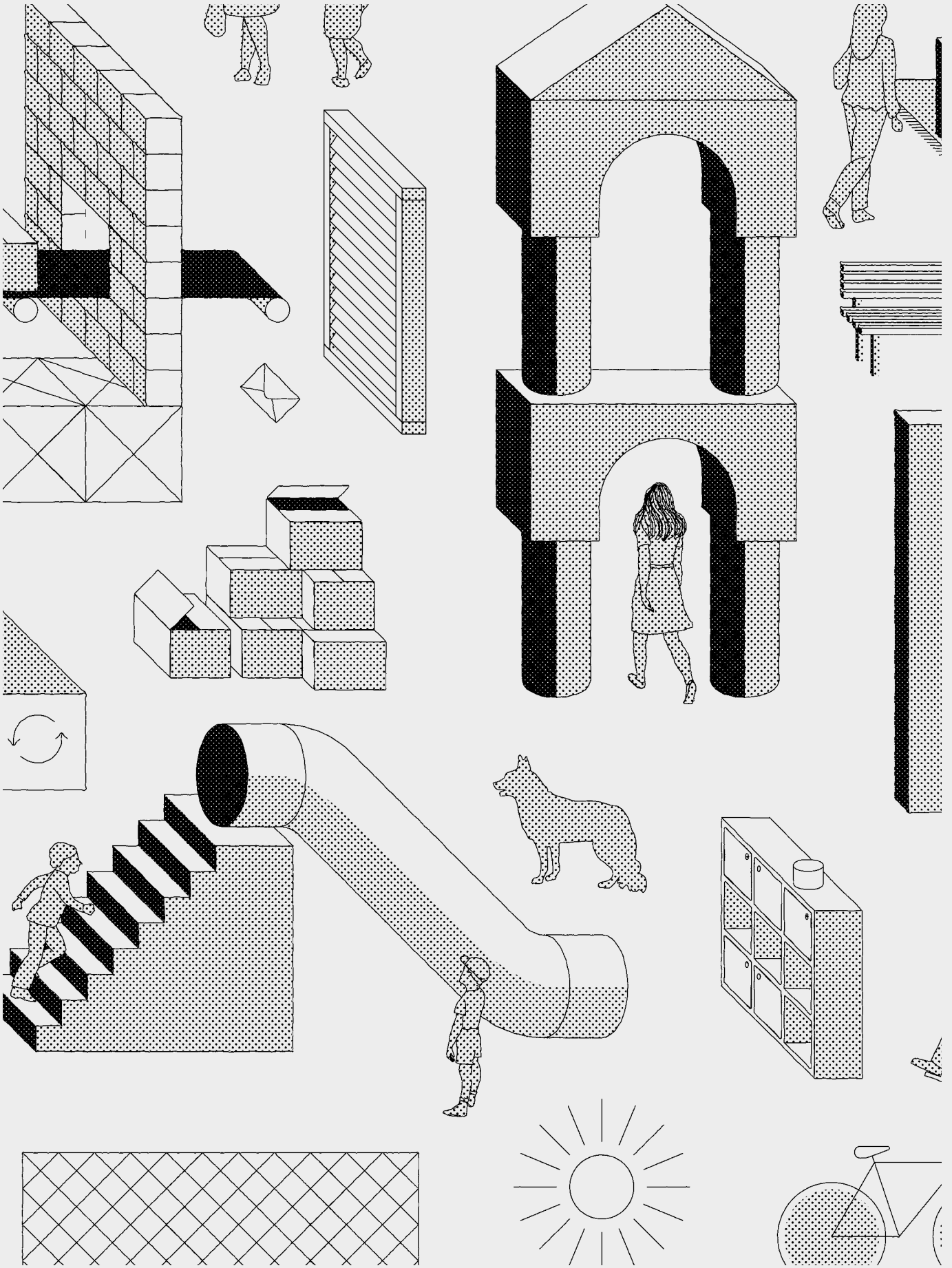
Image references

TBC

SECTION 1

HIGH DENSITY LIVING

Introduction



This Supplementary Planning Document [SPD] sets out detailed guidance on the implementation of policies in the Tower Hamlets Local Plan 2031. It seeks to support the plan to ensure that new homes and neighbourhoods are designed to provide a high quality of life for existing and future residents in the borough's high density environments.

Tower Hamlets is one of the fastest growing parts of the country. By 2031, the borough's population is expected to increase to nearly 400,000 residents. As well as providing homes for its own rising population, the borough is also expected to make a significant contribution toward helping London meet its strategic housing need. To achieve this, the borough is seeking to secure the delivery of at least 58,965 new homes during this period. However, the land available for new development is decreasing. The borough has already undergone significant development in recent years, limiting the number of sites that are available for redevelopment and intensification.

The borough must also safeguard land to meet local and regional employment and industrial needs.

To meet these challenges, development is being brought forward at high densities in an evolving landscape of built form that is increasingly characterised by tall buildings, with densities in excess of 1,100 habitable rooms per hectare.

Although a common way of living in Europe and beyond, flats and high density living is relatively new in the UK. High density can be an attractive choice for diverse people and stages of life including families, the elderly and young professionals. Journeys to work and school are short, there is easy access to services and community uses and homes can be generous, airy and can evolve as needs change.

This SPD provides guidance to shape high density development so it supports good quality of life for Tower Hamlets' residents.



The SPD responds to important recent changes in national and regional policy. The new London Plan places significant emphasis on optimising density to deliver new homes but does not set out target density ranges, unlike the previous iteration. Instead, the plan leaves upper density levels open and states the higher the density of development the greater scrutiny is required of design, particularly qualitative aspects.

Both the new NPPF and new London Plan place great emphasis on design to achieve high quality buildings and places. The NPPF encourages plans and supplementary guidance to provide maximum clarity about design expectations at an early stage through visual tools such as design guidelines.

The high density living SPD seeks to provide a clear design vision and set expectations for future high density development in the borough. The document does not seek to focus just on how these buildings look but how these new forms of development can help to ensure that existing and future residents and people working in the building can enjoy a high quality of life.

It supports the vision, objective and policies of the Tower Hamlets Local Plan 2031, supporting priority 1 and 2 of the Mayor's Strategic Plan.

Priority 1

People are aspirational, independent and have equal access to opportunities

1. People access a range of education, training, and employment opportunities.
2. Children and young people are protected so they get the best start in life and can realise their potential

People access joined-up services when they need them and feel healthier and more independent

3. Inequality is reduced and people feel that they fairly share the benefits from growth.

Priority 2

A borough that our residents are proud of and love to live in

1. People live in a borough that is clean and green.
2. People live in good quality affordable homes and well-designed neighbourhoods.
3. People feel safer in their neighbourhoods and anti-social behaviour is tackled.
4. People feel they are part of a cohesive and vibrant community.



In particular, the SPD provides detailed guidance to help the council deliver its vision to support existing communities and welcome new residents to make their home within liveable, mixed, stable, inclusive and cohesive neighbourhoods, which contribute to a high quality of life and more healthy lifestyles. To achieve this, the guidance sets out how new development can share the benefits of growth in Tower Hamlets by contributing to the creation of healthy environments, encouraging physical activity, promoting good mental and physical wellbeing and reducing environmental impacts. It also demonstrates how the benefits of growth can be shared by creating mixed and balanced communities, delivering tenure-blind development and increasing opportunities for social interaction.

The SPD highlights which specific Local Plan policies it provides guidance on the implementation of. These include:

- Policy S.DH1: Delivering high quality design
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy D.DH6: Tall buildings
- Policy D.DH7: Density
- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality
- Policy S.CF1: Supporting community facilities
- Policy D.CF3: New and enhanced community facilities
- Policy S.OWS1: Creating a network of open spaces
- Policy D.OWS3: Open space and green grid networks
- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES2: Air quality
- Policy D.ES3: Urban greening and biodiversity
- Policy D.ES5: Sustainable drainage
- Policy D.ES6: Sustainable water use and infrastructure and wastewater management
- Policy D.ES7: A zero carbon borough
- Policy D.ES9: Noise and vibration
- Policy D.ES10: Overheating
- Policy D.MW3: Waste collection facilities in new development



Status of the document

The High Density Living SPD is a material consideration to help determine planning applications for high density residential and mixed-use development. The SPD provides further guidance on how to meet existing London and Local Plan policies.

The document provides best practice recommendation on how the design of High Density environments can best support the quality of life of residents in a particular building. The SPD does not provide guidance on other considerations such as townscape, aesthetics or materials. However, it highlights the fundamental role of typologies and layouts in optimising site capacity in a way that provides the best residential environment. Accordingly this emphasises certain typologies over others.

Applications are not expected to meet all the design recommendations but to demonstrate how they have considered recommendations to meet the objectives set out in the topics and the borough wide issues.

Where the guidelines apply

The guidance will be applied to C3 residential and mixed use development across Tower Hamlets that is considered high density. High density is defined as schemes that exceeds 1,100 habitable rooms per hectare or includes an element taller than 30 metres. High density does not necessarily always imply that buildings are tall, however in the borough tall buildings are almost universally high density due to the small size of sites and the building typology pursued.

1,100 habitable rooms per hectare is used in this SPD as a threshold for high density as it was established by the previous London Plan as the highest threshold in the density matrix. The 30m threshold comes from the Tower Hamlets Local Plan definition of a tall building and the height within which a development becomes referable to the Mayor of London.



Calculating density

The previous London Plan set out target density ranges relating to location, existing building form and massing and the index of public transport accessibility (PTAL). The new London Plan does not set out target density ranges but instead places significant emphasis on optimising site capacity which means ensuring that the development takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies.

However, measures of density are still required to be provided by the applicant to assess, monitor and compare development proposals and to establish whether this supplementary planning document applies. For the purpose of this document the density is measured per building and habitable rooms per hectare the preferred measurement as it better establishes the number of residents likely occupying a building.

Single Building

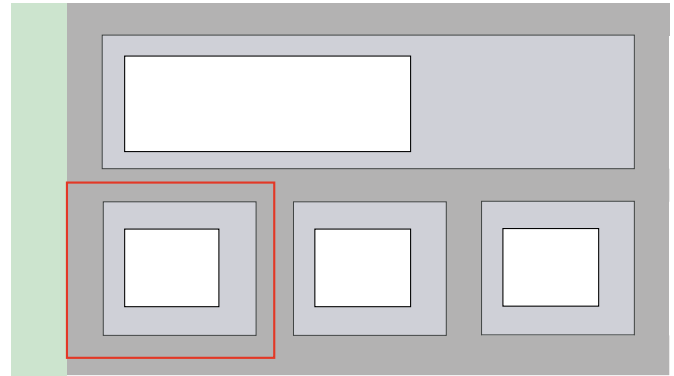
If the development is bordered by a street serving buildings on both sides, the boundary of the site area should be established at the centre of the street. If the street only serves the development, the entirety of the street should be included within the site area. Where bordered by a building of another development, site area can follow ownership.

Multiple Buildings

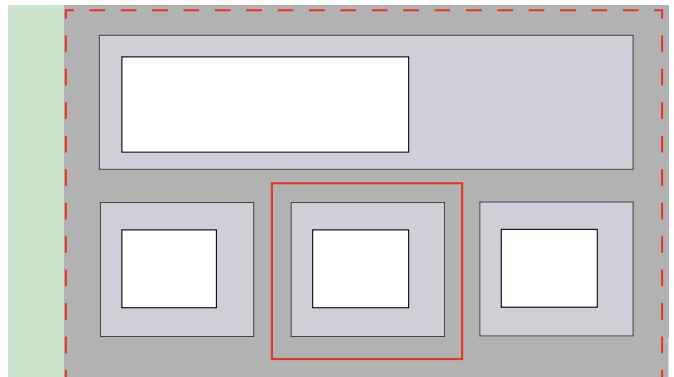
In the case of applications for a masterplan or a number of buildings, density calculations are still required per building. Site areas should be established for each building, set at the mid line between each building and following the principles established above.

Other uses

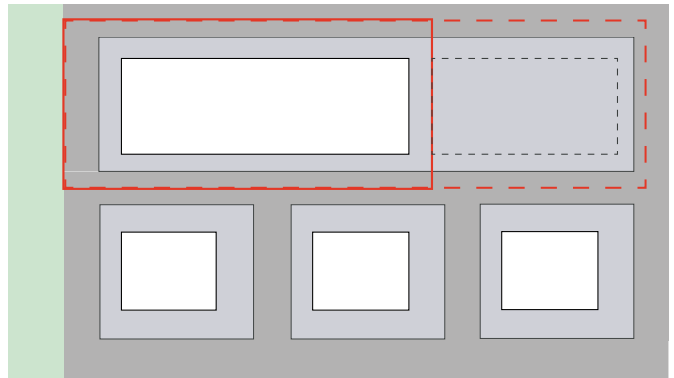
If a site includes other designations such as public open space or transport infrastructure these should be excluded from the site area for the purpose of residential density calculations.



Gross site area calculated for a single building



Gross site area calculated for a building within a masterplan



Gross site area calculated for a building adjacent to an open space

Calculations

Residential only:

$$\frac{\text{Number of habitable rooms}}{\text{Net site area}}$$

Mixed use:

$$\frac{\text{Number of habitable rooms}}{(\text{Residential GIA/ Total GIA}) \times \text{Net site area}}$$

GIA = Gross Indoor Area

Net site area = 78% gross site area

Context

Despite the increasing prevalence of high density residential homes, there is limited understanding of what it is like to live there. In response to this, Tower Hamlets council conducted one of the largest and most comprehensive pieces of research into the lives of residents living in high density and tall buildings. A literature review, including studies such as LSE's Density Project, helped define the scope of the research.

Case Studies

Nine representative case studies were selected; this sought to ensure surveys captured a wide range of experiences and forms of density. The selection process included densities from 1,100 habitable rooms per hectare (h/ha) to over 3,000 h/ha, and heights from below 10 to above 30 storeys. They were located across the borough, have been occupied for a minimum of two years and featured a mix of tenures. A range of different building typologies were also selected.



St Andrews - Barrat Homes, Allies and Morrison



Goodman's Field - Berkeley Homes, Lifschutz Davidson Sandilands



Caspian Wharf - Berkeley Homes, KKM Architects



Millharbour - Weston Homes, Chantrey Davis



Mastmaker - Ballymore, Brady Mallalieu



Lincoln Plaza - Galliard Homes, Hamiltons and BUJJ Architects



Landmark - Chalegrove Properties Ltd, Squire and Partners



Park Vista - Ballymore, Paul Davis Partners



Pan Peninsular - Ballymore, SOM

Residents Survey and Interviews

To begin the research process a post-occupancy evaluation was conducted with residents of each of the nine case studies. This took the form of a survey of each of the nine case studies structured around different areas of a building, elements that contribute towards a good quality of life and demographics for example experiences living with children and use of communal spaces. In order to get a fair representation of residents, tight sample quotas were used. This required a good mix of people living at different areas of the building, different flat types, different tenures, etc. as well as demographic quotas such as age and gender. A door to door survey method was chosen to meet the quotas specified above but also to get a good response rate. Through the door to door survey, a response rate of 40% was achieved surveying 560 residents. In three schemes, all of them private, access was not possible so online and postal surveys were used. The response rate for this method dropped to 4% surveying 172 people. The resulting data was analysed and crosstabulated with factors such as household size, home size, location of the home within the building, housing tenure and presence of children.

Follow up interviews were conducted with a further fifty residents and site visits conducted with building managers to explore emerging topics in more depth.

Neighbourhood Survey

To understand impact of high density development on existing communities, a neighbour survey was conducted. This spoke to resident's door to door or stopped those in the street in a 400m radius around each of the nine case studies. The survey covered impacts of the building on local services, the character and appearance of the neighbourhood, the environment and living conditions. In total, 562 people were surveyed.

Environmental Modelling

To develop a holistic understanding the experience of high density living, it was important to understand environmental and wellbeing criteria such as daylight, sunlight, overheating, building energy use, outlook, privacy and their interdependencies.

Environmental consultants Expedition were employed to develop a framework for defining

metrics, targets and appraisal methods for the different criteria and model case studies to test the framework and support the development of design guidelines. The approach included a novel 'clustering and sample' method to model similar context conditions, details of which can be found in the appendices. The method and findings are grouped into context conditions, dwelling typologies and environmental design parameters as well as the overall performance of each of the nine case studies.

Further Engagement

Alongside engagement with residents, it was important to appreciate the perspective of built environment professionals working in the field of high density residential development.

A steering group was established with Developers, Architects, representatives of Housing Associations and other built environment experts to shape the scope of the project and content of the surveys. Then architects of the nine case studies were interviewed to understand the design and development process and lessons learnt. Workshops were held with housing associations and building managers to appreciate their particular challenges and needs. In addition, various departments across the Council including waste, highways and children's services fed in as guidelines were developed.

Finally, the project was presented at the Council's Developers forum and Conservation and Design Review Panel to offer further opportunities to shape the content of the design guidelines.

Development of the Design Guidelines

To develop the SPD, findings of the research process were analysed by comparing results from each of the nine case studies. These were then cross checked against the design of each case study to establish features that were more or less successful at supporting good quality of life.

These good design features were used to inform the design guidelines. Design guidelines were also informed by best practice established through further engagement and research outlined above as well as an analysis of existing policy and guidance and an extensive literature review on relevant topics such as design for dementia, the circular economy and child friendly design.

Intended users

The document provides guidance on how to design, deliver and manage high density residential development.

The document is intended to be used by various stakeholders and throughout the development process:

- The development community and designers to use in preparation of applications for residential or mixed use buildings, community infrastructure or elements of the public realm.
- The development community and designers in the preparation of management plans.
- Council case officers to use as a way to frame pre-application and application discussions.
- Council case officers to review planning applications and assess if they meet the objectives of the Local Plan and result in a high quality of life for residents.
- Council officers to inform the development of new capital projects including public realm, streets, parks and community facilities.

Topic papers

The document begins by setting out the findings of the extensive engagement and research that have been carried out. These are structured around five topic areas and resulting challenges and opportunities which manifest in high density developments:

- Children and young people
- Mixed and balanced communities
- Everyday life
- Buildings as systems
- Healthy neighbourhoods

Topic papers also outline a section of overarching design objectives for each of these issues.

Typology summary

The document then identifies the primary high density building typologies and identifies the relative benefits and challenges of each for achieving good living environments for both residents of the building and the surrounding neighbourhood.

The selection of an appropriate building typology in the early stages of the development process

means objectives and design guidelines can be more easily achieved.

Design guidelines

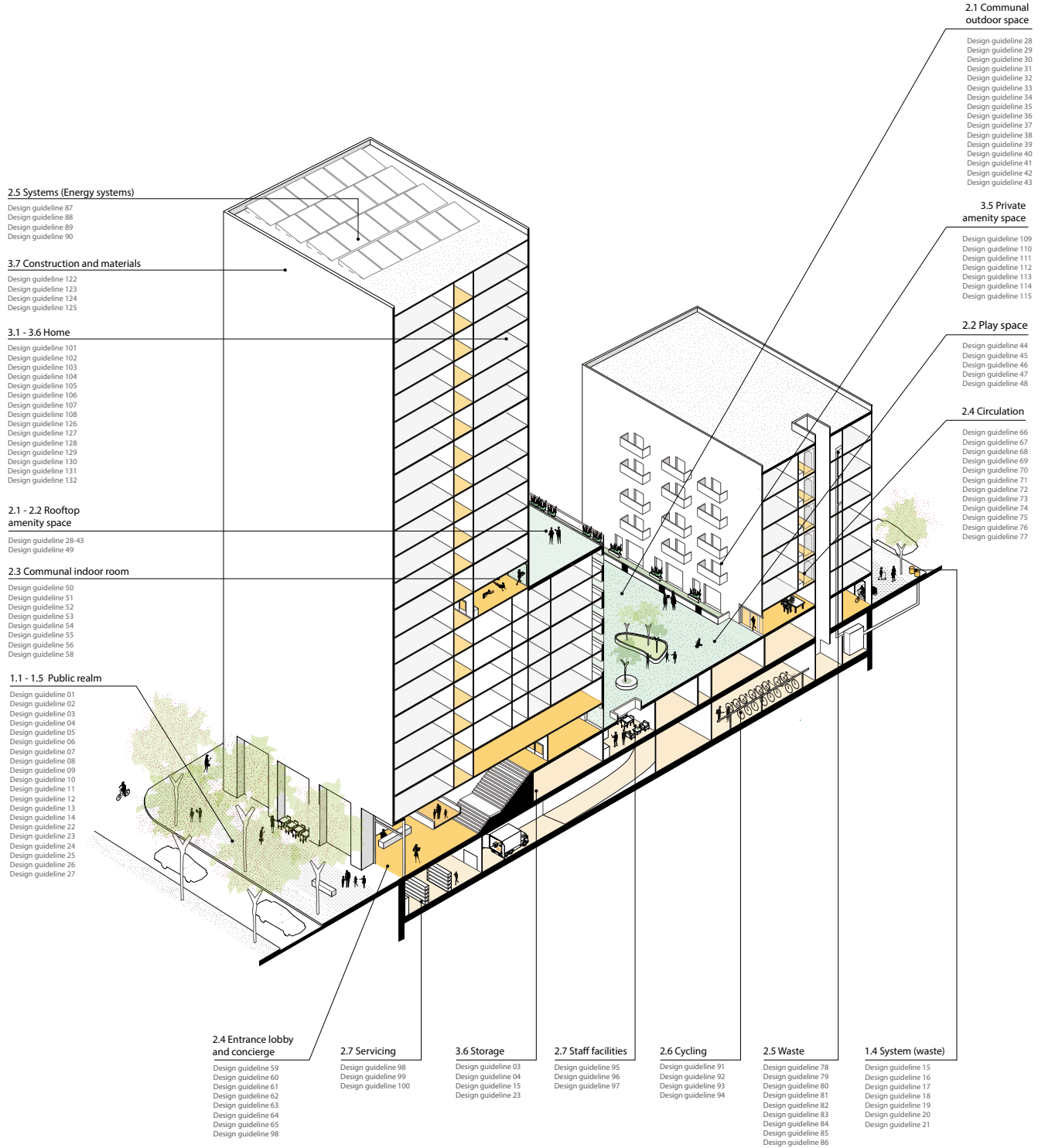
The main body of the SPD is made up of detailed design recommendations that will help ensure new development meets the objectives of each topic. The recommendations are organised around three main elements of a development; the area around the building, communal spaces and the individual home.

The document aims to be a comprehensive guide to the delivery and management of high density residential and mixed-use buildings. Accordingly, guidelines are broken down into three subtypes:

- Design guideline – new design recommendations that provides further detail on how to meet existing Local Plan requirements and the objectives of the SPD.
- Existing policy – the document draws together existing policy and guidance that should be reinforced when developing high density residential buildings.
- Further considerations – design features that are beyond the scope of planning but are important when creating successful high density buildings and to achieve the objectives of the SPD.

Each design recommendation includes a relevant case study and/or illustration. These are supported by findings from the extensive survey and interview process alongside established architecture, urban design and planning principles where appropriate.

Whilst the design guidelines are extensive, most can be easily achieved with the selection of an appropriate building typology.



Active Frontages

A building front that promotes activity and encourages cross-movement between the building at ground level and the adjacent public realm by the way the building is designed or orientated. A building provides active frontage if the ground floor avoids blank walls or obscured frontages, includes windows and openings, and provides a variety of uses all of which also contribute to natural surveillance and support the visual and physical relationship between the building and ground level.

Affordable Housing

Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and our (the council) housing allocation policy.

Communal Amenity Space

An area within the curtilage of a residential development that can be accessed by residents of the development. It is used for recreation and provides visual amenity, e.g. gardens or landscaped space.

Building Manager

Or estate manager. A permanent member of staff who supervises the day to day running of a residential development. This includes maintenance and repair, waste, site staff management and health and safety.

Circulation space

Area of communal space from the main building entrance to the front door of a home. This covers the lobby, lift and corridor.

Community facilities

Uses such as public houses, libraries, youth facilities, meeting places, places of worship, public conveniences and other uses in use class D1 that provide a service to the local community.

Concierge

Or care taker. A permanent member of staff who is front facing, dealing with resident queries. Tasks include handling requests from residents, post and deliveries, presenting properties to potential residents and handling marketing. Concierges typically occupy a front desk so also provide a level of security and assistance to visitors.

Daylight

Natural light that enters a building.

Doorstep Play

Areas close to the home that support play for young children under 5.

Family Homes

Houses and flats which contain three or more bedrooms.

Family Rooms

Indoor communal amenity space that is suitable for use by children for a range of activities.

Habitable Room

A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, corridors, hallways, utility rooms or similar should not be considered habitable rooms.

High Density

Residential or mixed-use development that exceeds 1,100 habitable rooms per hectare.

Laundry Cupboard

Cupboard capable of containing a washing machine, space to dry clothes and storage of cleaning equipment.

Legibility

The degree to which a place can be easily understood and moved around in.

Multifunctional space

A multifunctional space is a 'shared' public space or communal space, which offers a range of leisure and recreation opportunities for users of all ages whilst including soft landscaping to improve urban greening, biodiversity and drainage.

Nature Play/ Natural Play

Play space that facilitates interaction with nature.

Neighbourhood Officer

A member of staff tasked with organising and coordinating communal events for residents. They also link residents with various services and opportunities in the wider area.

Outlook

Views out of the building.

Play Space (dedicated)

Spaces where play is identified as a prime function. These include playgrounds, playing fields, skate parks and other recreation areas.

Playable Space

A playable space is one where children's active play is a legitimate use of the space. Playable space typically includes some design elements that have 'play value': they act as a sign or signal to children and young people that the space is intended for their play. Playability is not just a matter of the physical characteristics of a space. It can also be influenced by social and cultural characteristics.

Private Rented Sector

All non-owner occupied self-contained dwellings that are being rented out as housing (not including forms of affordable housing).

Public Art

Fixed artworks which members of the public are able to access and appreciate. Works may be sited in the public, civic, communal or commercial domain, in semi-public or privately-owned public space, or within public, civic or institutional buildings. Artworks can form part of the structure or decoration of buildings, landscapes and streetscapes.

Public Realm

The space between and surrounding buildings and open spaces that are accessible to the public and include streets, pedestrianised areas, squares and water spaces.

Social Integration

The extent to which people positively interact and connect with others who are different to themselves. It is determined by the level of equality between people, the nature of their relationships, and their degree of participation in the communities in which they live.

Specialist Housing

Specialist housing refers to supported housing such as sheltered housing, residential care homes, nursing homes and dual-registered care homes.

Sunlight

Direct, non-obstructed, sunshine.

Sustainable Urban Drainage

Water management practices that integrate natural water processes.

Tall Building

Any building that is significantly taller than its local context and/or has a significant impact on the skyline. Within the borough, buildings of more than 30 metres, or those which are more than twice the prevailing height of surrounding buildings (whichever is less) will be considered to be a tall building.

Traditional waste collection

Waste is collected and stored in large bins which are regularly transported to the street or public realm to be emptied by a specialised truck.

Typology

Grouping buildings based on their form. For example, a terrace, tower or perimeter block.

Underground Waste Collection

Underground waste tanks with smaller access points integrated into the public realm. These are emptied on a regular basis by specialised collection vehicles.

Urban Greening

Urban greening describes the act of adding green infrastructure elements such as green roofs, street trees, and additional vegetation. The Urban Greening Factor is a land-use planning tool to help determine the amount of greening required in new developments.

Urban Heat Island

The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, the centre of London can be up to 10°C warmer than the rural areas around the city.

Vacuum Waste Collection

Or pneumatic refuse collection. Tubes carry waste deposited into intake hatches/ portholes at speed to centralised storage areas or directly to a collection vehicle.

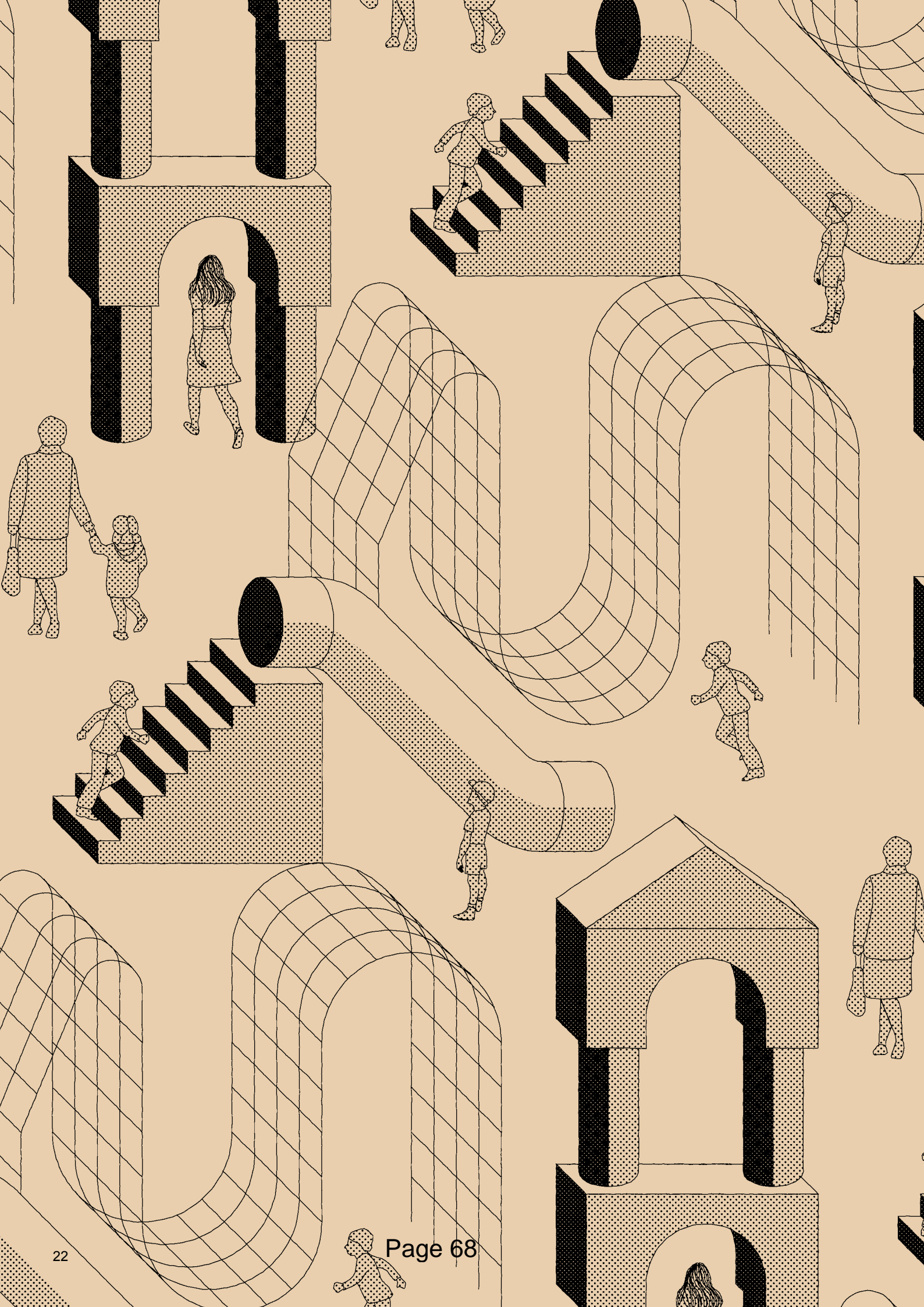
Window to floor area ratio

The ratio of total, unobstructed window glass area to total floor area served by the windows, expressed as a percentage.

SECTION 2

TOPIC PAPERS

Children and young people
Mixed and balanced communities
Everyday life
Buildings as systems
Healthy neighbourhoods





Children and young people

In Tower Hamlets

Tower Hamlets is a young borough, with the largest proportion of young people compared to other inner London boroughs, and the fourth youngest population in the UK. Overcrowding is a concern with 37% of households on the council's housing waiting list living in overcrowded conditions.

43% of children in year six were overweight or obese compared with 39 % in London and 34% nationally¹.

Families are being asked to live in increasingly high density living environments, and it is essential that the needs of children and young people are given careful consideration when designing these types of development.

At high density

Across all case studies, 32% of those surveyed lived in a household with children or young people under the age of 16.

Overcrowding

These households occupied a range of home sizes, including one and two bedroom dwellings. 42% of households with children do not live in family homes (three bedrooms or more). 52% of three bedroom homes are occupied by flat sharers or other models where residents are not related.

The study found that families are occupying homes distributed throughout these developments, including in the upper levels of tall buildings. Larger families (with three or more children) tended to live on lower floors. Half of the families we spoke to said that they would prefer to live closer to the ground.

Play

21% of those surveyed did not think living in high density environments was appropriate with children, this rose to 37% when residents were asked if they thought it appropriate to live in a tall



building with children. Residents told us that this was typically due to lack of green space and play space.

38% of the residents we spoke to thought that they had limited access to outdoor space, with 42% of households with children regularly playing in places away from the development they lived in. 29% of residents living around a high density building used spaces around the building often, for example for relaxing exercising or play.

Stimulating places for play and socialisation are essential for well-being, health and development.² This however can be a challenge in high density environments where there is competition for space.

1. Tower Hamlets Borough Profile 2018

2. GLA Play and Informal Recreation 2012

‘This is the play area... look at it, you can see “no ball games”, so what the hell are they going to do?’

Mobility and independence

Children and young people move through the city and building differently and less predictably than adults. Play can occur anywhere, it is not restricted to designated areas. In addition to the provision of stimulating play space, design of the development should acknowledge the movement of children and young people to promote independent mobility by mitigating real and or/ perceived risk.

79% of children did not play unsupervised; this was due to safety (36%), play space being too far from home (17%) and play space out of sight (12%).

Young people

Young people in high density environments can be stereotyped as contributors to anti-social behaviour but at the same time can have limited mobility and independence due to the perceived safety of public spaces.

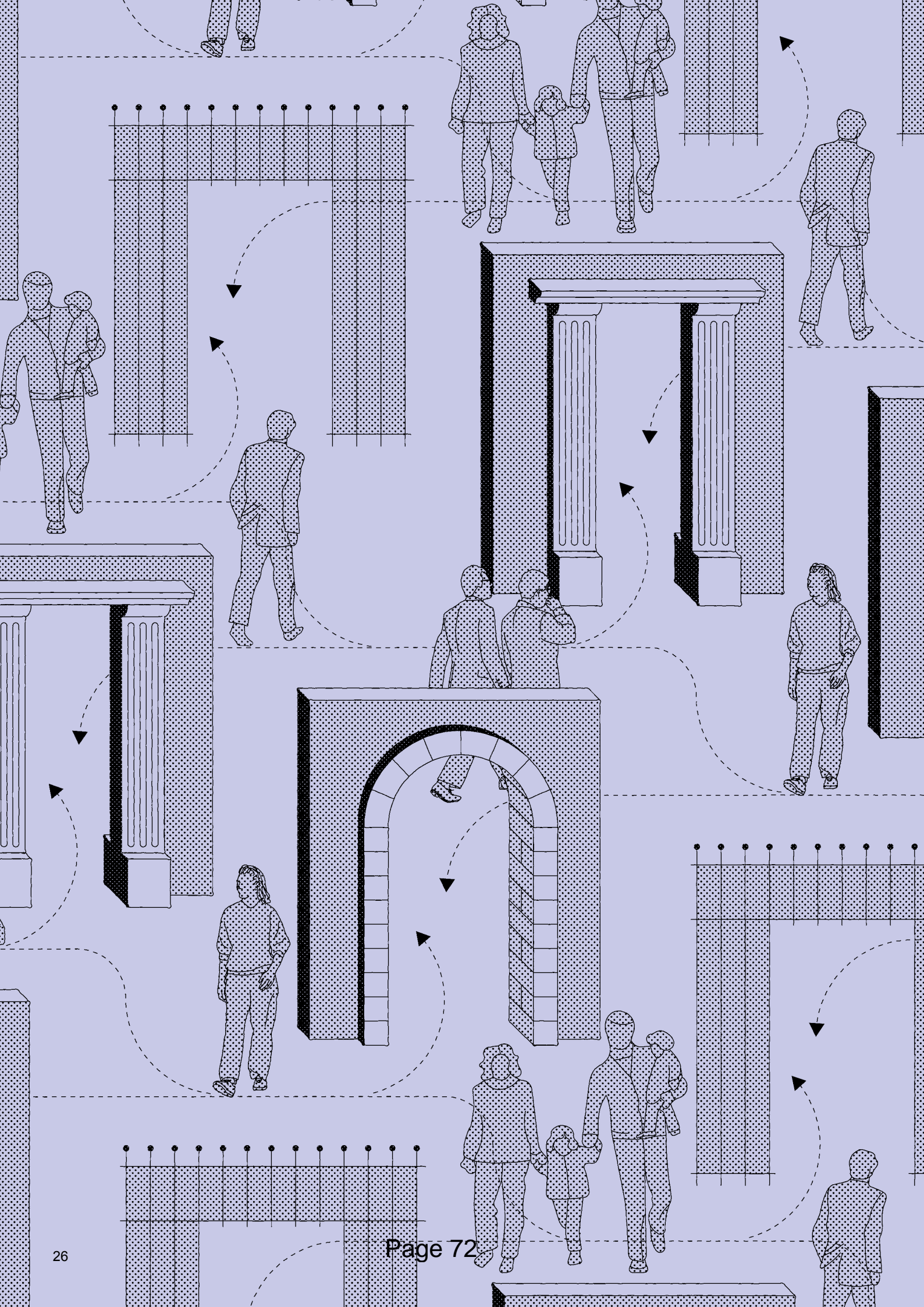
Design of high density environments should provide suitable spaces for young people to congregate and socialise. These should provide independence and freedom whilst mitigating perceived risk.

What does a child and young person friendly city look like?

- There is a good network of pedestrian routes.
- Pavements are wide and include cycle lanes and frequent pedestrian crossings.
- Public spaces are common and spaces form an integrated network.
- Key services such as schools and nurseries are in close proximity to homes.
- Work places are close to the home so parents do not have to commute far.
- Public realm is engaging and fosters a sense of belonging for example through public art, water features and mixed uses.
- There is good access to nature through integration of nature into residential areas and multi-functional, resilient green infrastructure.
- There is good access to diverse cultural and heritage spaces.
- Community uses are flexible and support imaginative play, physical activity and socialising for and between all ages.
- Facilities are conveniently and safely located to promote independence.

Objectives

- Provide sufficient and varied space for children and young people to play and socialise
- Integrate play space with other spaces and amenities to encourage use
- Support play provision with facilities for adults
- Make it easy for children to move around the building and use play spaces independently
- Allow play or gathering in most parts of the building - not just designated spaces





Mixed and balanced communities

In Tower Hamlets

Tower Hamlets is one of the most diverse boroughs in London and the UK in terms of its social and economic make-up. Whilst the borough has the third highest economic output in the UK, 57% of children are still living in poverty.¹

The borough is ranked as the 16th most ethnically diverse local authority in England, with more than two thirds of residents belonging to minority ethnic groups.² People from all backgrounds and age groups in the borough can face challenges from inequality, loneliness and isolation. These challenges often have detrimental impacts on physical and mental health of residents.³

To share the benefits of growth and tackle social segregation, high density development should equally meet the needs of Tower Hamlets' diverse population and foster integration between all of its residents.

At high density

Social integration (the extent to which people positively interact and connect with others who are different to themselves) is an essential aspect of creating mixed and balanced communities. Integration is determined by the level of equality between people, the nature of their relationships, and their degree of participation in the communities in which they live. An equal, integrated, community is beneficial for health and well-being. It tackles loneliness, isolation and conflict between different individuals and groups.

Neighbourhood

The borough is already dense, with limited space available for redevelopment. High density schemes are introduced into existing neighbourhoods and communities.

On average, 67% of residents living around high density buildings did not feel that people living in the building were part of the local community. This varied significantly between case studies;

1. Trust for London Tower Hamlets 2020
2. Tower Hamlets Borough Profile 2018
3. https://www.towerhamlets.gov.uk/lgnl/health__social_care/Tackling_loneliness/Tackling_Loneliness.aspx



at one building 92% of neighbours said residents were not part of the local community whereas at another 92% found that they were. 82% of residents living around the building had never used facilities within it but 39% felt it had impacted their access to local services. This suggests factors including design, tenure and accessible uses all contribute to the integration of high density buildings and its residents into the neighbourhood.

‘So when developing anything don’t just densely populate it with people who are not going to speak to each other, try and find the connections.’

Community

High density living environments can make it difficult for residents within the building to connect and interact with each other. However, if designed and managed correctly, they can present a good opportunity to improve social integration.

Across all case studies, 38% of the people we spoke to felt their building lacked a sense of community. Lack of community was experienced the greatest by owner occupiers compared to private or social renters.

In developments where communal outdoor or communal indoor areas were provided, these were not used regularly by all residents. 37% of residents reported never using communal outdoor areas compared with 23% who said that they used these spaces regularly. In addition, 38% reported never using communal indoor areas compared with 22% who said that they used these spaces regularly.

Relationships

In developments where communal courtyards were provided, 27% of residents said that they have interacted with neighbours while using these spaces. 31% of residents reported interacting with neighbours in roof top communal spaces, where these were provided.

From speaking to residents, we found that the lobby, lift and corridor were the primary spaces where residents first interacted with their neighbours. Some residents told us that they often felt like they were living in a hotel.

‘Here it feels like we’re stuck in a hotel or something.’

Management

69% of residents we spoke to felt their building was well managed. Residents were particularly positive about the presence of a concierge. These staff members improved perceived sense of safety and supported a sense of community.

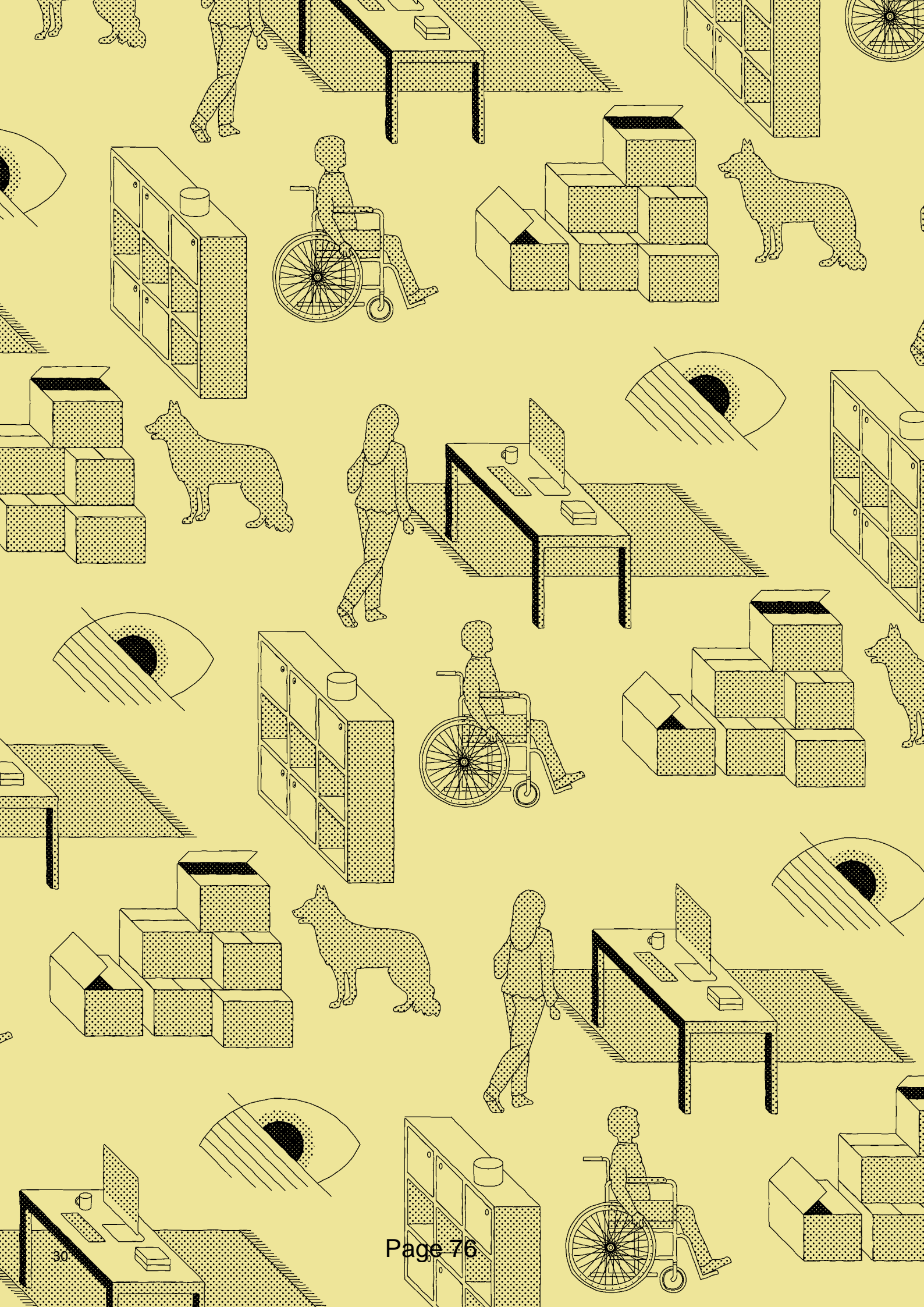
Management is essential for the good use of communal spaces. This includes surveillance of spaces as well as programming events. In case studies, communal spaces that were difficult to access, such as roof tops, were closed. Communal facilities should have good visibility from the main entrance lobby or key routes around the building to reduce management costs and the risk of anti-social behavior.

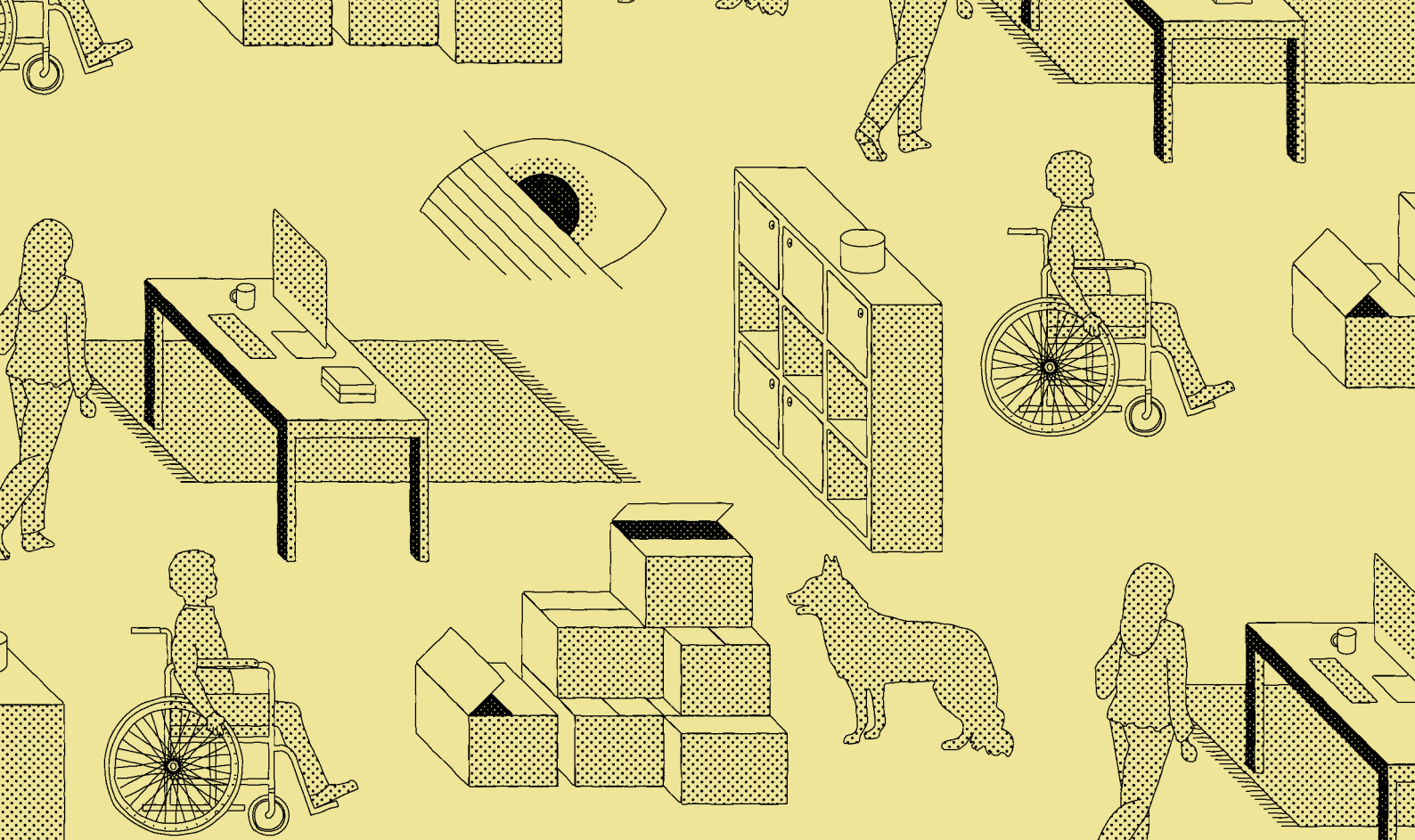
What does a mixed and balanced community look like?

- Streets and a network of public realm prioritises walking and cycling.
- Streets, public realm and the layout of buildings should be easy to navigate.
- Generous public realm and public facilities create destinations that appeal to a wide range of people, foster a sense of belonging and reduce social segregation. For example, by including public art, water features and community cafes.
- The design and management of spaces encourage people to linger.
- Flexible design of communal spaces supports a range of uses and faiths.
- Tenures are mixed, and it is not possible to distinguish between tenures by looking at the building.
- Location and design of communal amenity spaces encourage regular use.
- Circulation spaces are comfortable and enjoyable places where people linger.
- Building management encourages a sense of ownership.
- Homes are a place of rest and relaxation.

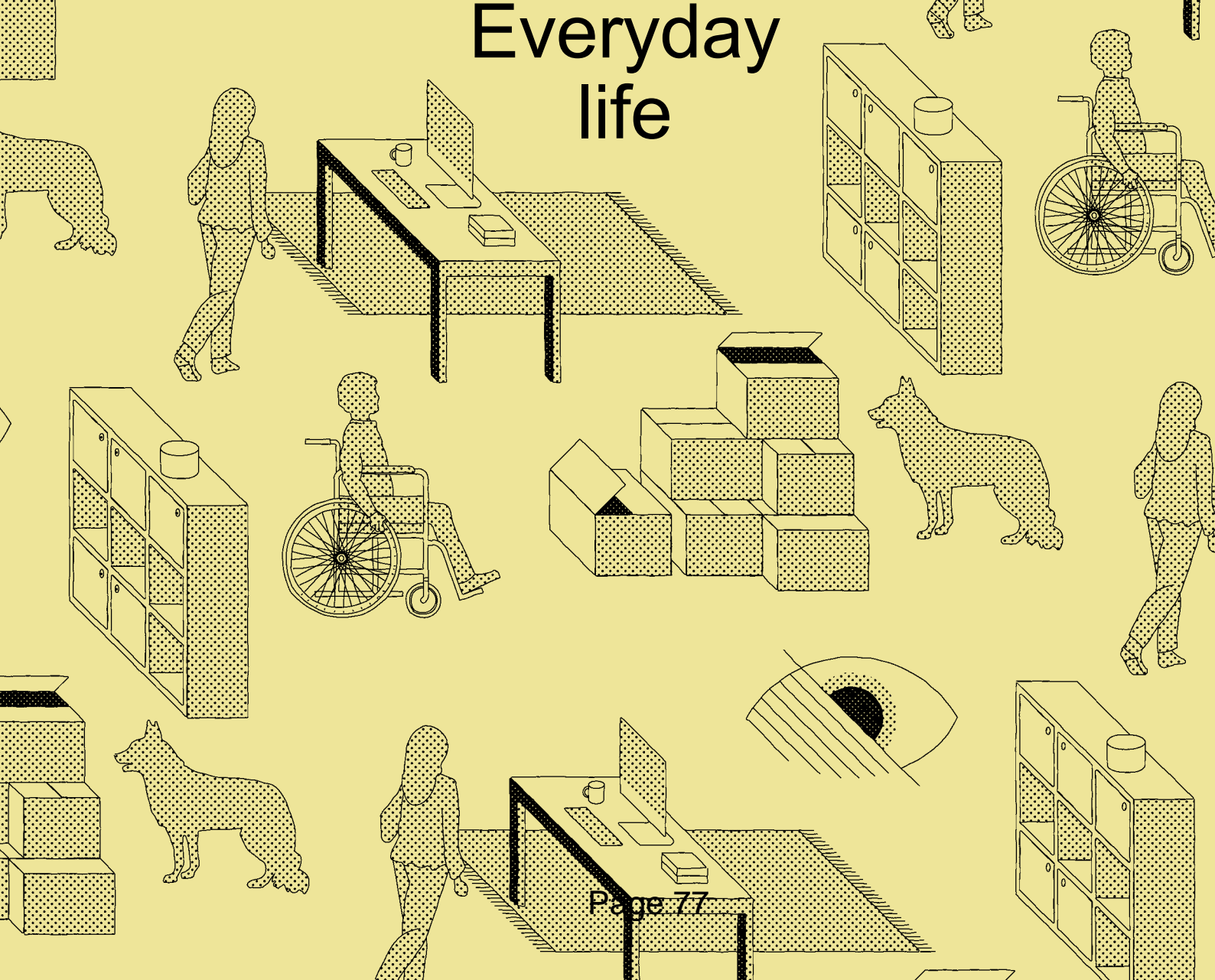
Objectives

- Provide opportunities for residents to meet and interact with residents in the neighbourhood
- Provide opportunities for residents of different tenures and blocks to cross paths regularly
- Increase sense of safety, sense of belonging, familiarity and care
- Increase opportunities for residents to share space on a regular basis





Everyday life



In Tower Hamlets

Tower Hamlets is the fastest growing local authority in England and Wales. Since 1986 its population has doubled to 308,000 residents, and it is expected to reach 365,200 by 2027. In response to the increasing population, Tower Hamlets has delivered more homes than any other authority in England in recent years. Between 2012 and 2017 15,250 homes were built, this included the most affordable homes built in London during this period.¹

Successfully meeting the demands arising from a rising population is not just about the number of new homes, it is also about the quality of life that they create. Residential development should combine physical space with civic and social activities to support the changing needs of individuals and families at different stages of life, and where, for whatever reason, more periods of time are spent in the home.

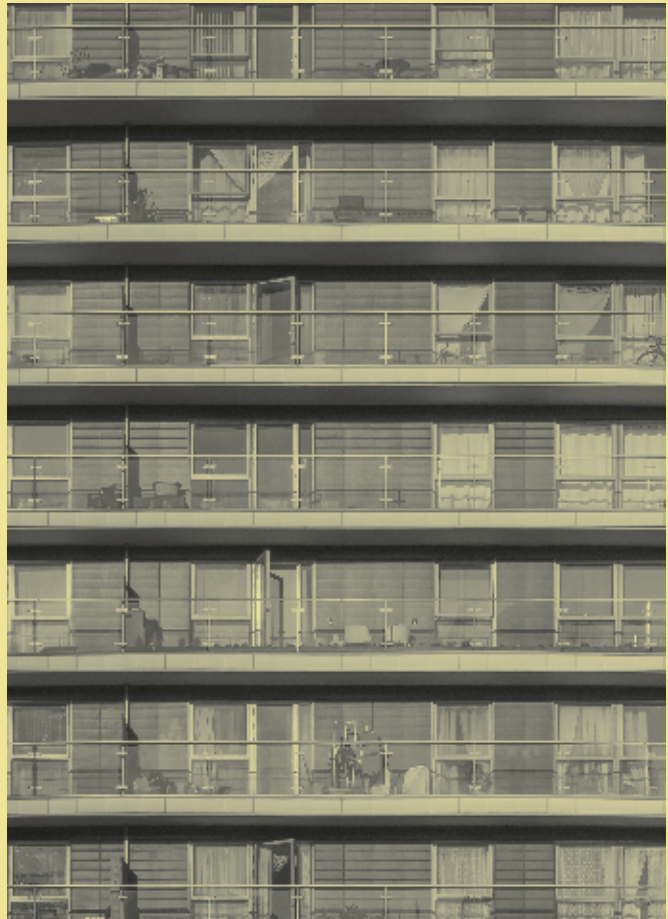
At high density

Everyday life covers the regular and changing needs of residents where they live.

Domestic chores

In high density development, where space is constrained, the spatial and technical requirements of everyday tasks, including laundry and cooking, are often overlooked. This can result in conflict between different ways domestic spaces are used. 17% of residents we spoke to felt they could not easily wash and dry their clothes in their home. In addition, some residents told us that sometimes they felt that the steps they had to ventilate their homes compromised their privacy.

‘they’re not building things that people find nice as homes, they’re building things that are functional’



Home based working

A quarter of the UK overall working population lives at their workplace or works at home for a minimum of eight hours a week. Most live and work in spaces and buildings that have not been designed around the dual use. This can lead to frustration, inefficiency and stress.² Home based working is often more than sitting at a desk with a computer and incorporates a range of occupations with different spatial requirements. This can range from beauty therapy, catering, childminding, jewellery making and legal services.

Ageing and health

The design of homes should provide flexibility to meet resident’s different needs, which may change over time, such as from ageing, illness and impairment. The design of homes, communal spaces and the public realm should consider orientation, movement and enjoyment by the less able, including the deaf and visually impaired and those suffering from physical and mental illness.

1. Tower Hamlets Borough Profile 2018

2. F. Holiss, Home-working, London Metropolitan University

This will avoid unnecessary additional disruption and enable people to maintain independence for longer, improving life quality. If circumstances result in greater time being spent in the home, the design of high density development should foster social interaction to help counter isolation and loneliness.

Pets and plants

As the urban population, and the number of people living at high density, increases, so does the pet population. The design of high density development should consider the needs of pets and their owners, to allow people to enjoy living with their pets and to help avoid conflict between residents. Gardening is beneficial for health, wellbeing and social integration but opportunities are often very limited in high density schemes.

Flexible and adaptable

Storage was a significant concern for many residents, with 34% telling us that they did not have sufficient storage space. In particular, some residents said that unequal bedroom room sizes and awkward flat configurations restricted adaptability of the home including furniture layouts. Some also stated they would need to relocate when their family grew. Specialist interior fit outs, such as non standard materials, and confusion over building management also restricted options to adapt the home.

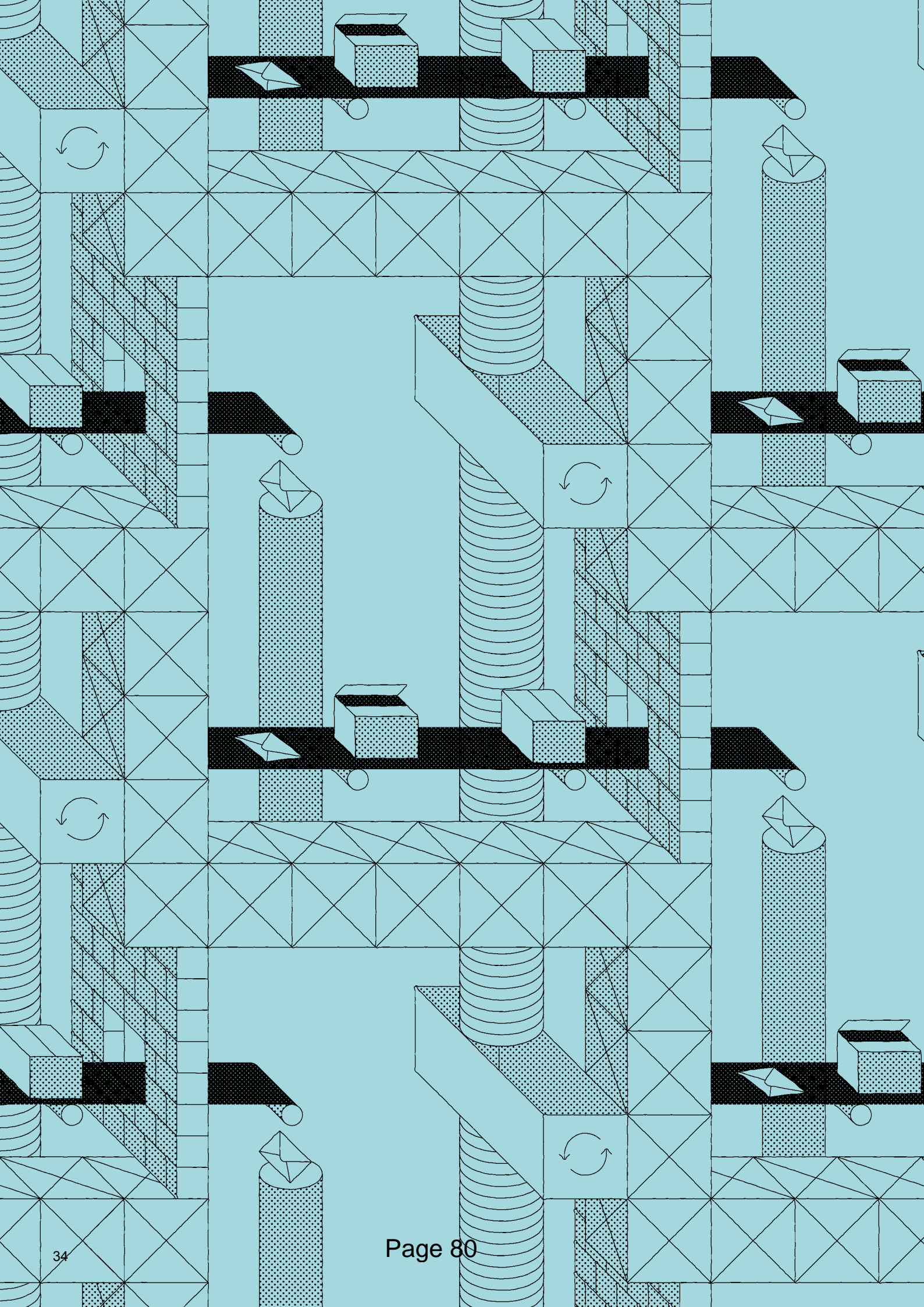
‘One of the bedrooms is a good size for us right now... I worry about it as the girls grow up.’

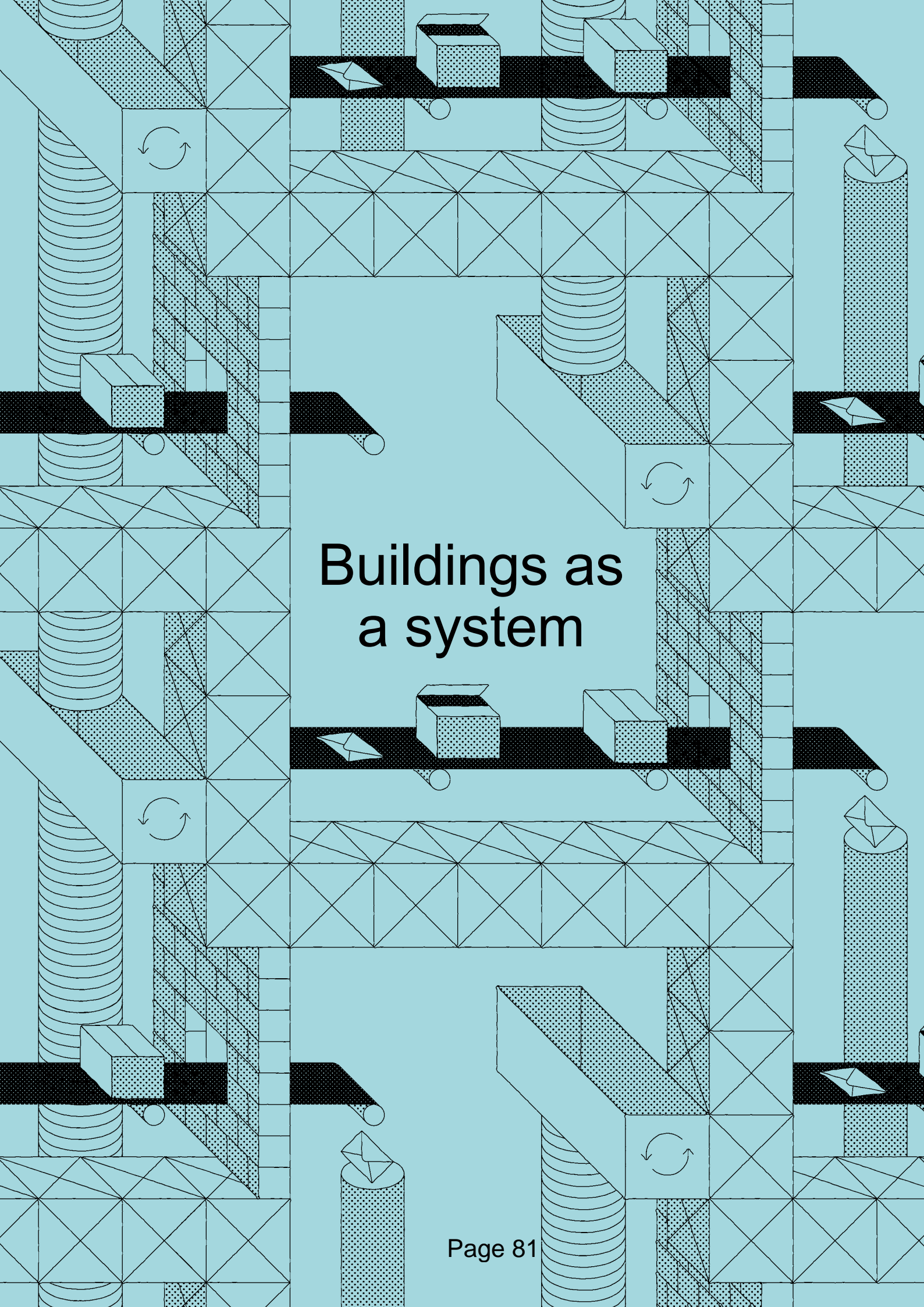
What does a city that supports all residents and their evolving needs look like?

- Legible and accessible public realm, entrances and communal facilities.
- Clear and distinctive routes around buildings, particularly leading to communal spaces that are easy to navigate for everyone.
- Circulation spaces encourage a sense of ownership and belonging.
- Indoor communal spaces are designed to be flexible, to support various types of home based work.
- Routes through outdoor communal amenity spaces and public realm are multifunctional and robustly built.
- Homes are spacious and flexible so internal layouts and fittings are easily adaptable to support changing lifestyles and everyday tasks.

Objectives

- Design to legitimise home based work addressing flexibility, isolation and nuisance
- Design should be flexible and easy to adapt to meet different needs as they change over time
- Design to consider the needs of pets and their owners
- Design should consider everyday activities and their implications on home standards
- Design standards acknowledge diverse users who experience spaces differently such as autism, dementia or those with poor eyesight.





**Buildings as
a system**

In Tower Hamlets

Tower Hamlets declared a climate emergency in March 2019. The borough is currently the third highest emitter of carbon dioxide in London. Although the council has introduced initiatives to try and tackle this, significant changes are still required to achieve zero-carbon and sustainable development in the borough.¹ For example, in 2018/19 only 23.2% of waste was recycled in the borough and at present only one in five residents are cyclists.^{2 3}

London has lower rainfall than the national average while having a very high population density. This has resulted in London being declared by the Environment Agency as an area of serious water stress.⁴

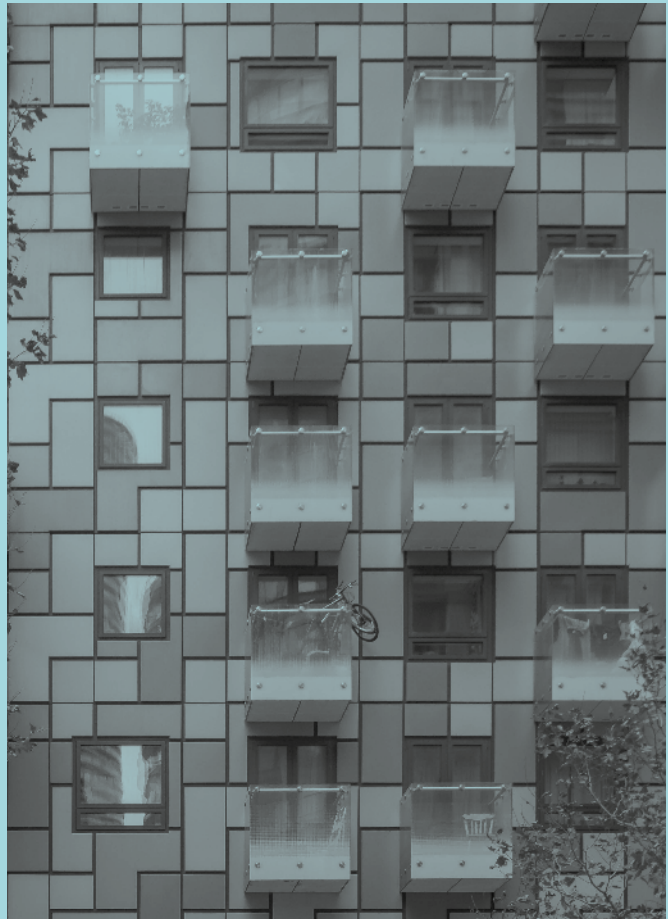
At high density

New homes and neighbourhoods should be designed to reduce environmental impacts, whilst improving the quality of life for residents and building managers. The design and management of buildings must move toward a low carbon circular economy to improve efficiency and reduce environmental impacts.. This involves consideration of the interconnected network of systems, such as water, energy, materials as they flow throughout the building.

Waste

Meeting recycling and composting targets requires design and management solutions that reduce waste and support recycling at the individual, building and borough scale. 66% of the residents that we asked thought that waste rooms in their developments were kept clean and were attractive. However, when we explored this in more detail residents reported a number of issues with waste recycling systems, particularly residents not using the systems correctly resulting in mess and smell. Bulky waste was a particular cause of disruption.

1. Tower Hamlets Borough Profile 2018
2. Tower Hamlets Waste Management Strategy (2018-2030)
3. Tower Hamlets Borough Profile 2018
4. Environment Agency Water Stressed Areas 2013



A number of residents also reported that they did not recycle, most often due to lack of space in the home, with 30% reporting lack of space. We also found that the collection of traditional Euro bins resulted in extra management requirements and clutter in the public realm.

‘over the weekend, you find people leave their rubbish right outside the lift because the space, itself, is so full.’

Water

Existing water stress is likely to be exacerbated by a changing climate and increasing population densities. Development must therefore be designed to be water efficient to reduce demand and wider strain on water resources.

Energy

Achieving a zero carbon city will require development to be both highly energy efficient and incorporate opportunities for renewable energy production, storage and use on site. On site electricity and heat production should be integrated into building design.

Management

69% of residents we spoke to felt their building was well managed, particularly in relation to security, repairs and dealing with deliveries. We also spoke to a number of building managers and caretakers. They told us that design issues, such as the lack of storage space and rest rooms negatively influenced the ease and efficiency of their work and their well-being.

‘The service charge is pretty high here, but then they are running a mini estate.’

Cycling

Many of the developments we looked at featured large areas of cycle storage, sometimes located in building basements. However, from speaking with residents we found that these were not well used, with 76% telling us that they never use them. 26% of residents who own a bicycle told us that they stored it in their home, instead of the communal store. This was in part due to accessibility of

the stores and perceptions about their safety. Designing cycle storage that is convenient and safe will help to encourage more residents to take up cycling.

The circular economy

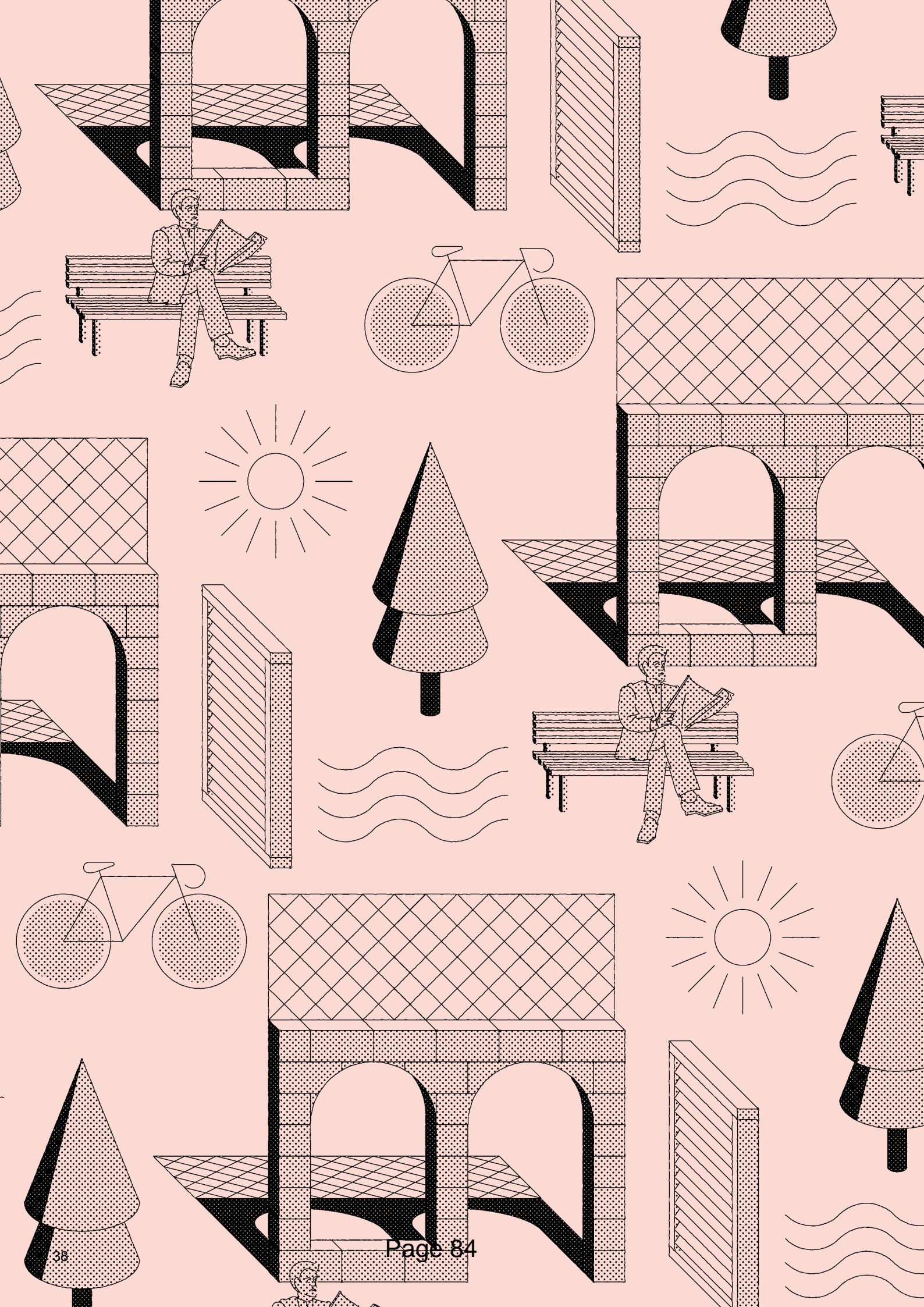
Buildings should be designed to help reduce waste by using efficient design and construction techniques and by encouraging the re-use of materials. They should also support the sharing economy to help reduce costs, consumption and facilitate social interaction.

What does a sustainable high density environment look like?

- Multifunctional public realm and communal amenity space that prioritises walking and cycling.
- Soft landscaping that improves biodiversity, sustainable drainage and urban greening that is robust enough to be playable.
- Waste collection methods that reduce residual waste and reduce clutter in the home and public realm.
- Buildings are flexible, adaptable, easy to repair and incorporate reused and re-usable materials.
- Buildings are efficient in their use of water and energy, and also generate their own energy where possible.
- Shared facilities are provided to reduce consumption and promote social interaction.
- There is a dedicated space for building managers with a good presence that supports their work practices.

Objectives

- Reduce waste, particularly through the ease and efficiency of waste collection
- Reduce water use and the load on the water network
- Zero carbon through efficiencies and renewable energy
- Easy and efficient building management
- Facilitate the transition to the circular economy
- Cycling is safe and convenient



Healthy neighbourhoods



In Tower Hamlets

Cities can directly shape the physical and mental health of the people living in them. Access to good quality green space and well-designed homes contribute toward a good quality of life, whereas a poor quality environment and sub-standard housing conditions can be detrimental to health and wellbeing.

Tower Hamlets has amongst the lowest life expectancy in the UK, with life expectancy linked to areas of deprivation.¹ The quality of the built environment can play an important role in improving health and wellbeing in the borough and increasing life expectancy.

New high density development must be designed to achieve excellent environmental conditions to promote health and wellbeing of residents. Buildings should also positively contribute to the surrounding neighbourhood through considerations of solar access, wind, thermal comfort and the urban heat island effect.

At high density

The design of healthy high density environments requires a holistic approach that balances a number of sometimes contradictory parameters.

Daylight and sunlight

70% of the residents that we spoke to thought that their home received enough natural light, 17% did not. Many praised the bright spacious rooms, partly due to full height windows. However, some residents told us that they lacked light due to the building form and layout. There was a lack of consistency across homes. High density buildings were more likely to be experienced as detrimental to the surrounded neighbourhood. 35% of residents we spoke to in the areas surrounding high density schemes felt the building blocks sunlight to their home.

Temperature and ventilation

For many of the residents that we spoke to, overheating was a significant problem in the



summer months, 40% found their homes got too hot. Some residents told us that opening windows and balcony doors provided some relief, but pointed out that this exacerbated noise issues. 19% found their homes got too cold, with some residents telling us that this was due to difficulties with heating systems. Most residents said that they felt safe opening windows to ventilate their home but this decreased above 20 storeys. However, windows in some developments would not open or would not open sufficiently far. Some residents felt they needed to keep doors open to ventilate their home, particularly kitchens and bathrooms, resulting in privacy issues.

‘they’re boiling... you can’t open the windows that much, so you need a balcony’

Privacy

1. Annual Public Health Report 2018

24% felt they lacked privacy with 35% stating they could be seen in their homes. From interviews it was clear this was due to building typology and proximity to other buildings. Many would keep curtains permanently closed, limiting access to daylight and sunlight. 34% of those living in the neighbouring area felt high density developments were damaging to their outlook and privacy.

Noise

63% of residents told us that their homes were quiet. This was generally linked to the age of the building, with newer development being better insulated. Noise from corridors and from balconies was more of a concern than between rooms. This has implications for temperature control and ventilation. High density buildings were more likely to be detrimental to the surrounding neighbourhood. 35% of residents we spoke to in the areas surrounding high density schemes felt the building caused noise.

Wind

28% of residents that we spoke to told us that wind adversely affected their private amenity space. When we explored this in more detail we found that the wind caused furniture to move around and that fixings to keep doors open sometimes failed. 32% of those living in the neighbouring area felt high density developments caused wind in their area.

‘Your furniture moves in the wind, if you’ve got a windy night you can come out and all of your furniture’s up at one end’

What does a healthy city look like?

- Homes are near a network of green and open spaces that are comfortable and enjoyable in all conditions.
- Homes are a place of privacy; people cannot be seen by their neighbours.
- Homes are bright, spacious and well ventilated.
- Homes are quiet; there is minimal disturbance from internal and external noise sources.
- Residents have control over internal temperatures; heating is affordable and easy to control, homes do not overheat and are easy to ventilate.
- Public and private spaces are not adversely affected by wind or lack of light.
- Homes mitigate environmental impacts and are resilient to climate change.

Objectives

- The neighbourhood, communal spaces and the home are comfortable, attractive and enjoyable
- Residents have control over their environment
- Environmental parameters including daylight sunlight, overheating, energy demand, wind, outlook and noise are balanced holistically for optimal conditions
- Buildings and homes are resilient to the impacts of climate change

SECTION 4

TYPOLGY STUDY



Isle of Dogs. Photo: Jim Stephenson.

Building typologies are a tool to understand urban morphology; how a settlement develops and evolves over time. In architecture, planning and urban design a typology is the classification of built form into subsets. It concerns formal types such as the tower or terrace rather than functional types or uses, such as residential or a school.

Building typologies can incorporate residential densities in different ways. They are informed by plot size, topography and context. In turn, each typology varies in terms of plot coverage and height, shaping the formation of streets, public spaces, the wider townscape and resident quality of life in the building.

At high density

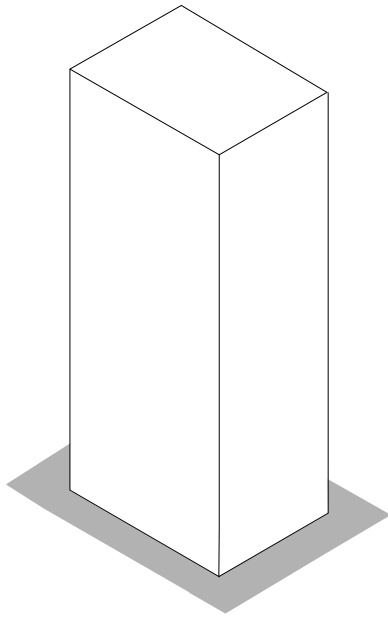
Land available for development in Tower Hamlets is decreasing. To meet the demand for housing development is being brought forward at high densities. Accordingly, this study considers building typologies that incorporate residential densities of a minimum of 1,100 habitable rooms per hectare. These densities however can be met in different ways; they are not limited to tall towers typically associated with high density development.

Each typology shapes space at different scales, with varying impacts on form and function. At the neighbourhood scale, typology impacts townscape, character and legibility. Typology shapes the network of streets and how we

orientate ourselves around them. Immediately around the building, typology informs the differentiation of public and private space. It informs definition of streets and open spaces whilst the way in which the built form incorporates different uses influences public life. The form of the building including position in the plot and the relationship to neighbours shapes the environment, impacting daylight, sunlight and wind.

Within the building, the form shapes the location, quality and use of communal spaces as well as access and movement patterns. Finally, typology informs the configuration of the home including layouts, access to daylight sunlight, outlook and privacy.

The following section outlines five standard residential typologies that achieve high densities. It outlines the benefits and challenges of each of achieving the design guidelines of this SPD and identifies guidelines that need particular attention.



The stand-alone tower, or point block, is a single tall building that usually sits in the centre of the plot. Usually the footprint is extruded upwards but the form can also be more sculpted or include cut outs to provide additional roof tops.



Colville Estate, London, UK.
Chipperfield and Karakusevic Carson.

- + generous public realm accommodates increased pedestrian flows and provides opportunities for social interaction and play
- + spacious indoor ground floor spaces for residents to gather
- + deliveries are internalized minimizing disruption in the public realm.



De Architekten CIE, Almere, NL.
OMA.

- + communal amenity spaces at ground floor that are visible and accessible to the wider community
- + maximization of dual aspect units throughout the development
- lack of outdoor communal amenity space



+ massing articulation creates opportunities for multiple rooftops

- Challenges

- Poor sense of enclosure and definition of the streets
- Poor deliniation of public and private spaces
- Harder to achieve a human scale at street level.
- Competition between public uses and back of house.
- The form can exacerbate wind.
- Challenge to provide sufficient and good quality outdoor amenity space and play space
- Rooftop spaces are difficult to access and manage
- It is difficult getting daylight and natural ventilation into the core.
- Hard to integrate tenures with two cores.
- Services usually located in the basement which can be unpleasant and far from the home.

+ Benefits

- It is easier to achieve good environmental parameters within the home, such as the number of dual aspect units and access to daylight- sunlight.
- Public realm around the building can be more generous.
- The number of units per core is reduced and the circulation space is more efficient.

Guidelines to be considered carefully when assessing an stand alone tower:

DG 1

In areas where there are multiple high density and tall buildings in the form of stand alone towers, space at street level can be constrained and unpleasant. Careful consideration of design guideline 1 is particularly important in order to provide more generous space that residents and visitors can easily access and enjoy.

DG 7

Constraints on space around tall buildings result in the obstruction of the public highway by servicing and delivery vehicles. This typology needs to carefully consider this design guideline, in particular the internalization of these activities within the building envelope to avoid excessive nuisance and obstruction of public highways.

DG 2 and DG 37

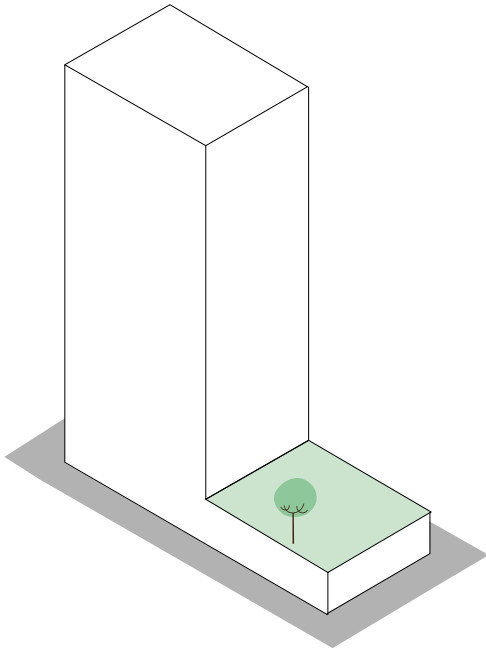
Spatial constraints of this type tend to result in the provision of communal amenity space either on rooftops or in the public realm. It is therefore important to consider these design guidelines to make sure the quality of the scheme and communal amenity areas supports the quality of life and needs of residents.

DG 12

This type does not easily contribute to a street based urbanism (DG 3 and DG 4) therefore consideration on location of entrances (DG 9) and uses (DG 8 and DG 10) is important to make it feel part of the wider neighbourhood.

DG 38, 39, 40, 41 and 42

Indoor communal amenity space tends to be the primary way of providing communal facilities in stand alone towers. It is therefore important for this type to carefully consider the above design guidelines



A podium is a platform of approximately one to three stories that usually fronts and defines the street. A tower then sits above this, set back from the edge of the podium so the tower and podium read as two distinct forms. The top of the podium typically includes outdoor communal amenity space and/ or play space.



150 Dan Leckie Way, City Place,
Toronto, Canada.
KPMB Architects.

- + Large podium with good access to daylight/sunlight maximises opportunities for a variety of uses throughout the day
- + Co-location of communal spaces (laundry, indoor communal spaces) and communal amenity space maximises overlook providing opportunities for independent play and minimizing ASB



100hoog, Rotterdam, NL.
Klunder Architects.

- + Tower set back from main street reduces its prominence at street level
- + Good quality and activated communal amenity space at podium level
- + cycle parking generous, easily accessible and well integrated in the development

Challenges

- It is challenging to accommodate residential uses in the lower section of the building.
- It can be difficult to provide adequate conditions for significant planting, such as larger trees, on the podium.
- The space for public realm can be limited.

Benefits

- Easier than a standalone tower to provide a sense of enclosure to streets and define the street network.
- Easier than a standalone tower to define the public realm and communal amenity spaces.
- It is easier than a standalone tower to integrate other uses such as a commercial space at the ground floor and then achieve active frontages.
- Outdoor communal amenity and play space on the podium is well overlooked.
- It can achieve good daylight and sunlight to the podium.
- The podium can mitigate wind impacts of tall buildings.
- Servicing, such as cycle stores and waste rooms, are more convenient if located in the podium.

This typology can more easily meet the design guidelines set up in this document so is encouraged. In particular **DG 3** and **DG 4** that seek to contribute to a street based urbanism. However guidelines to be considered carefully when assessing a tower on podium are:

DG 1 and 6

This typology shapes streets so it is important to consider DG 1 and DG 6 to ensure the street network is of good quality.

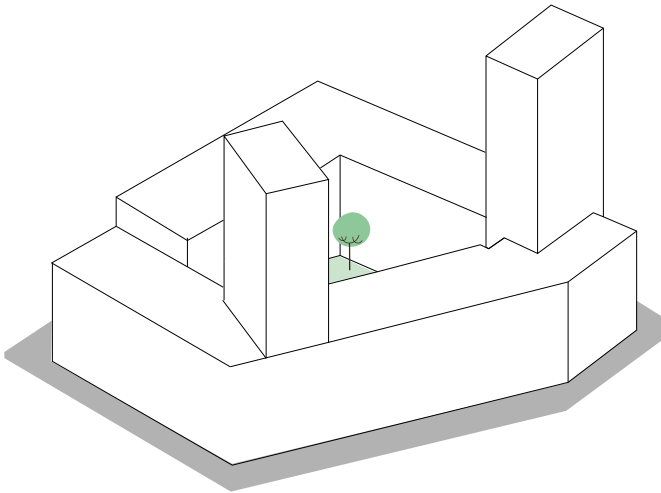
DG 11, 13 and 14

This typology naturally leads to deeper floorplates at lower levels which limits its capacity to accommodate certain flat types. However the podium can easily accommodate, as suggested in DG 8 and DG10, uses such as childcare facilities, community centres or cafes/restaurants for residents of the block and the wider neighbourhood. However careful consideration of the site characteristics and how to arrange active and more ancillary uses as per DG 11 is important to provide clear front and back and active groundfloors.

DG 30

The quality of the communal amenity space at podium level can easily meet most of the

environmental requirements (DG 18, 19 and 20) as well as overlooking and natural surveillance from flats onto the podium. However consideration of access to outdoor communal space at podium level and visual connection from the lobby as per DG 30 is important.



A perimeter block includes built form that wraps around the site in all directions, defining the surrounding streets with a communal courtyard in the centre. The block is not tall, less than ten stories, but can include one or more towers at different points around the



Via Verde, NY, US.
Dattner Architects in association with Grimshaw Architects.

- + massing is organized to frame the communal outdoor and indoor spaces, maximizing overlook
- + orientation maximises access to daylight sunlight
- + the design of the communal amenity spaces is playful and integrates play spaces into the wider design



Amsterdam, NL.
Hvdn Architecten.

- + courtyard on podium maximises site capacity while maintaining comfortable scale at podium level
- + pedestrians and cyclists access the internal courtyard via a bridge
- + communal facilities such as car parking, storage spaces and cycling parking is provided under the deck with access to natural light.



St. Andrews, London, UK.
Maccreanor Lavington.

- + massing articulation and reduced height on the southern edge maximises access to daylight sunlight into the courtyard
- + family homes at ground level allows private amenity space in the form of a terrace with direct access onto the communal courtyard.

Challenges

- The form can reduce access to daylight-sunlight in the courtyard and homes facing inwards, particularly those at the inner corners.
- There can be privacy issues, where people can be seen in their homes, particularly those at the inner corners.
- The number of homes per core can be high, with long corridors.
- It is difficult to achieve a large proportion of dual aspect homes, particularly if corridors are double loaded.

Benefits

- The perimeter block provides a sense of enclosure and defines the street network.
- Easier to integrate the building into the existing urban grain.
- Provides the opportunity to accommodate densities in a more traditional urban form.
- It can incorporate mixed uses and achieve active frontages at street level.
- Family homes can open out onto communal spaces, with a private terrace as a buffer.
- Opportunity to have residential front doors onto the street, activating the street.
- Easier to provide a central and shared communal amenity space, particularly between different tenures.
- Play space can be well overlooked and on the way from the entrance to the home.
- It can accommodate high densities without the need for great height.

This typology can more easily meet the design guidelines set up in this document so is encouraged. In particular the tower on a perimeter block typology allows for the provision of a central communal space that is well overlooked, potentially easily accessible by all tenures and easy to visually connect from entrances. These last two points are particularly important for the success of this type, therefore considerations of DG 23 and DG 24 is key. Other guidelines to be carefully considered when assessing this typology are:

DG 18

The early consideration of this design guidance is important to ensure acceptable levels of daylight/sunlight in the courtyard.

DG 22

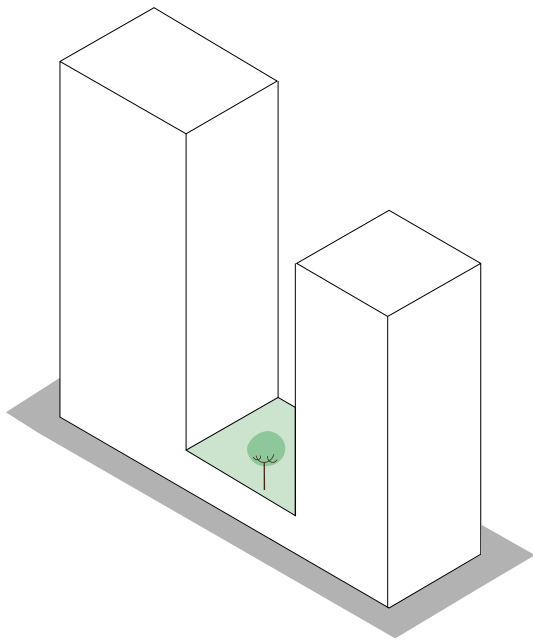
The use of landscape features and planting is important to protect privacy in key areas of the block both at ground floor and upper levels.

DG 52, 53, 54 and 55

Circulation spaces in the form of corridors is characterisitic of this type. It is important to consider the above design guidelines to ensure the good quality of circulation spaces.

DG 93 and 95

Applicants to look at this design guidelines in order to improve the daylight/sunlight performance of the large number of single aspect homes of this type.



The interlinked towers typology includes a minimum of two tall forms in a single plot connected by a podium or larger mass at the lower floors. The top of the form that connects the towers typically includes outdoor communal amenity space and/ or play space.



Batiment Home, Paris, France.
Comte & Vollenweider Architectes,
Hamonc + Masson & Associés.

- + towers massing is articulated to maximize daylight/sunlight access to podium level
- + home layouts and private amenity spaces are designed to minimize overlooking between units
- + access to landscaped open spaces at different floors provides a variety of well overlooked play options within the building



NXT & NXT2 at Windermere By the Lake, Toronto, Canada.
Architect Alliance.

- + element connecting towers permeable which increases legibility and visibility of spaces and activities
- + uses at ground level, including childcare and x, serve residents of this development and the wider community increasing social cohesion



Hoge Heren, Rotterdam, NL.
Wiel Arets.

- + 5 units per core to maximise dual aspect units
- + Communal amenity space in between towers well orientated improving access to daylight/sunlight
- / ancillary uses occupies 6 of the 7 storeys podium. However treatment of ground floor provides a permeable and active facade.

Challenges

- It is difficult to integrate the building into the street network.
- Access to daylight and sunlight can be poor to both outdoor communal spaces and in the home.
- There can be privacy issues, where people can be seen in their homes, due to closeness of the built form.
- The form can exacerbate wind.

Benefits

- The form has more opportunities to incorporate mixed uses and achieve active frontages at street level.
- The shared podium can result in a central communal amenity space that improves social integration.
- The form can accommodate high densities without the need for great height.

Guidelines to be considered carefully when assessing an interlinked tower:

DG 3 and 4

Given its prominent massing and scale it is important to carefully analyse its integration in the street network so it feels part of the city.

DG 18

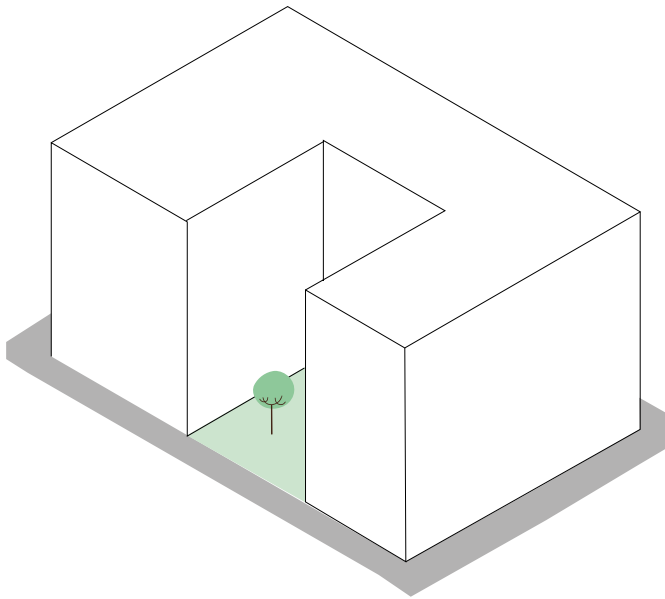
This typology needs to carefully address the challenges of daylight sunlight access into the communal amenity spaces through the location and shaping of the taller elements

DG 23 and DG 24

It is important to locate the communal space so it is easily accessible for both taller elements as well as visible from entrances to increase usability

DG 93, 97 and 98

In this typology privacy is usually compromised by the close proximity of the taller elements. The provision of dual aspect homes is key to make sure adequate levels of privacy are achieved in key areas of the home.



The footprint of the extruded block occupies the majority of the site and typically follows the site boundary, extruding directly upwards to form the building. Articulation or outdoor communal spaces are achieved through cutaways in the footprint, creating courtyards, or at the upper floors, creating smaller rooftop spaces.



JDS, Copenhagen, Denmark. BIG.

- + orientation and massing secures good levels of daylight/sunlight into the central space
- + orientation of blocks minimises overlook between units and creates views
- +circulation spaces have access to natural light and are generous



Abell and Cleland blocks, London, UK. DSDHA.

- + ground level is permeable allowing views into the courtyard from the street
- + landscape and planting in the communal amenity space provides opportunities for relaxation and protects from excessive overlook
- + private amenity space are well protected from wind and well integrated in the facade language



Park Hill Phase 1, Sheffield, UK. Sheffield council. Refurbishment Hawkins\Brown and Studio Egret West.

Challenges

- The bulky form can result in amenity impacts on surrounding areas, including loss of privacy and daylight/ sunlight.
- It can be difficult to achieve access to daylight-sunlight in courtyards and in homes at the inner corners.
- The number of homes per core can be high, with long corridors.

Benefits

- If the block includes deck access, it can provide a greater proportion of dual aspect units.
- The form can accommodate high densities without the need for great height.

Guidelines to be considered carefully when assessing an extruded block:

DG 18

To achieve acceptable levels of daylight and sunlight to internal courtyards consider the dimensions and orientation of internal courtyard.

DG 52, 53, 54 and 55

Corridors in this type can be very long. It is important to consider the above design guidelines are met to ensure the good quality of circulation spaces.

SECTION 4

DESIGN RECOMMENDATIONS

1. Around the building
2. Communal spaces
3. Home

1. Around the building

1.1 Quantity

Density implications
Amenity areas

1.2 Urban design

Make streets
Liveable streets
Accessibility

1.3 Public Uses

Interface

1.4 Systems

Waste
Climate Change
Water

1.5 Environment

Daylight and sunlight
Wind
Air quality
Soft landscaping
Biodiversity



The area around the building refers to the streets, spaces and uses that are accessible to both residents and people living, working and visiting around the building. It is the spaces that integrate the building and contribute to the neighbourhood.

Children and young people

Children and young people move through the public realm differently and less predictably than adults. Design of the spaces around the building should therefore acknowledge this to create a stimulating home environment and promote independent mobility by mitigating real and/or perceived risk.

Mixed and balanced communities

The design of public realm should promote inclusivity, providing opportunity for residents of new developments to meet and interact with each other as well as with residents. The building form and the network of streets and spaces will assist in the integration of residents with neighbours and the building within its urban context. This is achieved through improving the ease with which residents can navigate around the building and creating attractive welcoming spaces where people gather and cross paths.

Everyday life

Public realm design and ground floor uses need to be designed to work efficiently. Public uses offer residents and the community choice as their needs change whilst fostering social integration and contributing to physical and mental well-being.

Design and finishes of the public realm should take into consideration diverse uses to foresee challenges, for example moving house, movement of the less able and excessive wear from pets.

Buildings as systems

Development should facilitate the transition to the circular economy. Resource flows, such as water and waste, extend beyond the building through connection to existing networks. This point of connection typically occurs at the street level. Where pressures on space are high, good design can help integrate these processes. This reduces resource use, mitigates the impacts of the climate crisis and improves quality of life.

Green spaces with native plant species help adapt and mitigate to climate change through urban greening, biodiversity net gains and management of rainfall and flooding.

Healthy neighbourhoods

The scale and form of high density developments can have significant environmental impacts, including shading and wind tunnels. Orientation of communal spaces following environmental parameters and design mitigation measures can create more comfortable and enjoyable environments.

High density developments can result in a substantial increase in footfall focused around a small number of entrances. This alters and usually increases pedestrian flows in surrounding streets, and a greater demand is placed on surrounding public spaces, facilities and infrastructure.

New high density developments should create opportunities for improved public realm to reduce the impact of additional pressure on public open spaces and streets and to help blend major developments into the surrounding urban fabric. This could include new publicly accessible open spaces, wider footways and other street enhancements.

The quantity of space provided by the development should reflect on the additional pressures derived from the proposed densities. For example, fire evacuation points should be able to accommodate all residents.



Generous public spaces and public realm are multi-functional.

London Plan*Policy D8 Public realm*

Development Plans and development proposals should:

A encourage and explore opportunities to create new public realm where appropriate.

B ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.

Policy D9 Tall buildings

C Development proposals should address the following impacts:

c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas

d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building

Policy S4 Play and Informal Recreation

2) for residential developments, incorporate good-quality, accessible play provision for all ages.

At least 10 square metres of playspace should be provided per child that:

- a) provides a stimulating environment.*
- b) can be accessed safely from the street by children and young people independently.*
- c) forms an integral part of the surrounding neighbourhood.*
- d) incorporates trees and/or other forms of greenery.*
- e) is overlooked to enable passive surveillance.*
- f) is not segregated by tenure.*

London Housing SPG 2016*Communal and Public Open Space*

Standard 3 - Development proposals should demonstrate that they comply with the LPAs' open space strategies, ensuring that an audit of surrounding open space is undertaken and that where appropriate, opportunities to help address a deficiency in provision by providing new public open spaces are taken forward in the design process.

Standard 4 - Where communal open space is provided, development proposals should demonstrate that the space:
is overlooked by surrounding development;
is accessible disabled people including people who require level access and wheelchair users;
is designed to take advantage of direct sunlight;
has suitable management arrangements in place.

Tower Hamlets Local Plan*Policy D.DH2 Attractive streets, spaces and public realm*

Development is required to contribute to improving and enhancing connectivity, permeability and legibility across the borough, ensuring a well-connected, joined-up and easily accessible street network and wider network of public spaces through:

- a. improving connectivity to public transport hubs, town centres, open spaces, water spaces, social and community facilities and surrounding areas*
- b. maintaining existing public routes or appropriately re-providing access routes during the construction phases of new development, and*
- c. incorporating the principles of 'secured by design' to improve safety and perception of safety for pedestrians and other users.*

Policy D.H3 Housing standards and quality

c. for developments with 10 or more residential units, the minimum communal amenity space (excluding circulation areas, access routes and waste or bike storage) should be 50 square metres for the first 10 units plus a further one square metre for every additional unit thereafter.

Design guideline 1

High density developments should provide good quality public realm that can accommodate increase pedestrian flows and provide spaces for residents and visitors to enjoy.

The area provided should be proportional to the scale and number of new residents.

Design should support the creation of a network of spaces and improve accessibility and legibility.



Public realm is spacious and can comfortably accommodate pedestrian flows.

Mixed and balanced communities

Children and young people

Constrained public realm in front or around high density developments results in spaces becoming a thoroughfare as opposed to a place for resident and the wider community to enjoy.

Constrained space limits movement, play and gathering of children and young people.

Everyday life

Buildings as systems

From case studies, some developments fail to provide good quality public realm that attracts residents from the neighbourhood to meet and interact.

Spaces around the building were often small and piecemeal. Many suffer from overshadowing and a lack of street furniture so are not welcoming. In some instances, activities including play in water features were restricted by building management.

Healthy neighbourhood

Neighbourhood survey results found poor environmental quality prevents them from using outdoor space as it lacks appropriate levels of daylight/sunlight and is excessively windy.

Policy links

- Policy D.DH2
- Policy S.DH1
- Policy D.DH2
- Policy D.DH6
- Policy D.DH7

Design guideline 2

Public realm is a publicly accessible spaces such as streets, squares and open spaces.

Communal amenity space is a shared area for residents to foster social interaction between residents and provide opportunities for residents to externalise functions of the home such as relaxing outdoors, social events and exercise.

Play space is dedicated areas an equipment for children and young people.

Space requirements for each of these should be met independently. Location and design of these spaces should support achieving the above objectives.

Courtyards and podiums are encouraged as they clearly define each of these areas, providing a sense of ownership over the communal amenity and play spaces while being integrated into routes around the building.

If courtyards and podiums cannot be achieved and public realm and communal spaces are all provided at the ground floor, design should define these areas through soft thresholds (level change, soft landscaping, etc.) without feeling segregated.



- Mixed and balanced communities
- Children and young people
- Everyday life

Most of the case studies show that the way in which communal amenity space was delivered has resulted in the space functioning like public realm. This resulted in fewer opportunities for residents of the building to interact and get to know each other.

Policy links

- Policy S.SG2
- Policy S.DH1

The public realm is an integral part of any neighbourhood. It contributes to a network of public facilities such as parks or the library that become an extension of the home and contribute to a good quality of life.

High density developments become more livable when the public realm is designed and planned to support the specific needs of households with children, young people and the elderly. This provides benefits for all residents. High density living can then become a more desirable and feasible option for all types of households.

Make streets

A straightforward street network with a built form that defines streets makes it easier to navigate.

Liveable streets

Children and young people move around space unpredictably, space in the city should acknowledge this. Public realm should be playable, designing in play from the start.

Accessibility

The external finish and public realm immediately adjacent to entrances should prioritise the pedestrian whilst supporting ease and efficiency of access. Location, features and finishes should consider how the space would be experienced by the less able and in emergency situations.



A car free street with space to gather and sit.

London Plan

Policy D3 Optimising site capacity through the design-led approach

B Development proposals should:

3) be street-based with clearly defined public and private environments

Policy D5 Inclusive design

B Development proposal should achieve the highest standards of accessible and inclusive design. They should:

1) be designed taking into account London's diverse population

2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion

3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment

4) be able to be entered, used and exited safely, easily and with dignity for all

Policy D8 Public realm

Development Plans and development proposals should:

F ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm.

G ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.

J ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place

L explore opportunities for innovative approaches to improving the public realm such as open street events and Play Streets.

London Housing SPG 2016

Standard 2 - Development proposals should demonstrate:

a How the scheme complements the local network of public spaces, including how it integrates with existing streets and paths.

b How public spaces and pedestrian routes are designed to be overlooked and safe, and blank elevations onto the public realm at ground floor have been avoided.

c For larger developments, how any new public spaces including streets and paths are designed on the basis of an understanding of the planned role and character of these spaces within the local movement network, and how new spaces relate to the local vision and strategy for the area.

Local Plan

Policy D.DH2 Attractive streets, spaces and public realm

1. Development is required to contribute to improving and enhancing connectivity, permeability and legibility across the borough, ensuring a well-connected, joined-up and easily accessible street network and wider network of public spaces through:

- a. Improved connectivity*
- b. Maintaining existing routes*
- c. Secure by design*

2a. Optimise active frontages

b. Clear definitions and enclosure

c. A range of public spaces

d. Reduce visual clutter

h. High quality materials

i. Public art

j. Maximise soft landscaping

k. Locating entrances in visible, safe and accessible locations

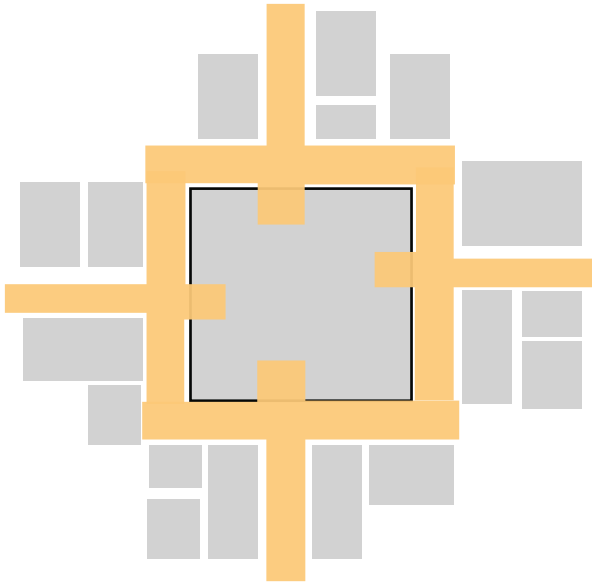
l. Natural surveillance

m. Design out concealment points and leftover spaces

n. Clear sightlines and improving legibility and lighting

Design guideline 3

The building footprint should be informed by a range of factors including the existing street network and the need to create coherent, legible streets.



Built form defines a network of streets and open spaces



The building massing corresponds to existing streets and creates new legible routes.

Children and young people

Connecting into a regular street network makes it easier for children and young people to find their way around the building and safely access neighbouring communal outdoor space, play space and facilities.

Mixed and balanced communities

A legible street network helps tie in the development into the neighbourhood.

Residents of neighbouring areas can easily navigate around the building and access public spaces, fostering social integration.

Policy links

- Policy S.DH1
- Policy S.DH2
- Policy D.DH6

Design guideline 4

The lower part of a building should provide clear definition and enclosure to streets.

This can be achieved with podiums and/or perimeter blocks.

Further Consideration

Where delivering a large scheme with multiple buildings, a masterplan led approach should be used to create a more comprehensive network of streets and spaces.



The built form provides definition and a sense of enclosure to the street and public space.

- Mixed and balanced communities
- Children and young people
- Everyday life

Streets are essential to navigation and public life. Defining them through massing helps create a network of spaces.

Some case studies fail to define streets around the development. This results in leftover space that is underused or uncared for.

Policy links

- Policy S.DH1
- Policy S.DH2
- Policy D.DH6

Design guideline 5

Public realm, including streets, should be designed to prioritise the pedestrians and, where appropriate, cyclists. The public realm should also encourage incidental play.

This could include:

- a connected loop of car free space around the building
- wide pavements
- a buffer zone of at least 1.5m between the road and path that could take the form of planting, SUDs, bike stands and changes in paving material or texture
- street trees
- water features
- high quality public art
- boulders, logs and benches
- security features with dual use such as planting or seating



The street is car free and is designed to encourage play. Furniture and equipment are robust and can be moved.

● Children and young people

Children move around space unpredictably and play and explore beyond designated spaces.

Designing in play into the public realm, beyond designated areas, creates a safe and stimulating environment. It also helps mitigate real and/or perceived risk associated with independent mobility.

When case studies did provide play space in publically accessible areas this was separated by fencing. In

Instances where children played outside of designated areas, such as in a water feature, was restricted by building managers.

● Everyday life

● Mixed and balanced communities

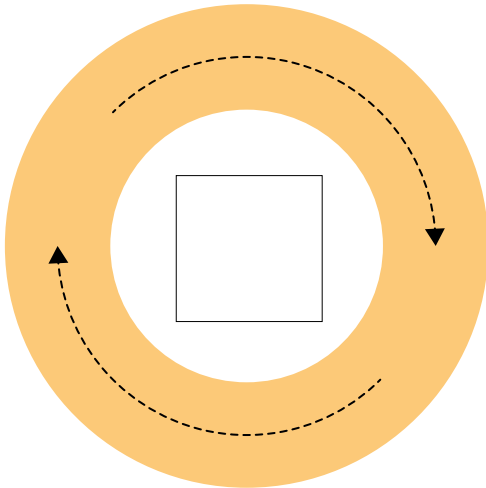
Creating safe and enjoyable public realm encourages activity and active travel.

Walking and cycling encourages residents to cross paths on a regular basis, fostering social integration.

● Buildings as systems

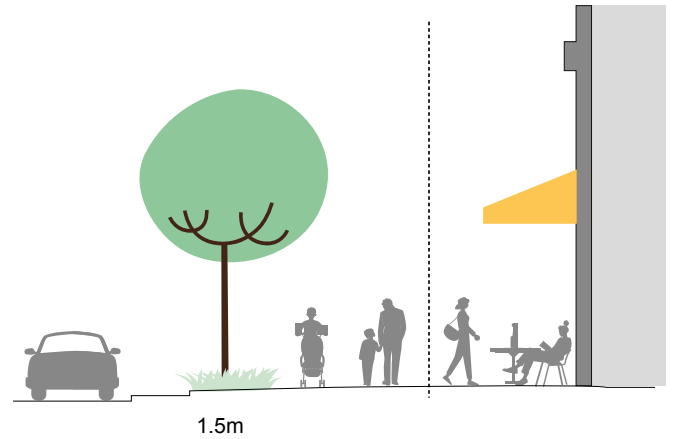
Increasing areas of landscaping improves drainage and therefore mitigates against flood risk and improves biodiversity and air quality.

No case studies included sustainable urban drainage.



● Car free zone

Ground floor/ landscape plans should indicate a car free zone around the development.



A street section. Pavements should be generous and protected from traffic with a buffer.

Policy links

- Policy S.DH1
- Policy D.DH2
- Policy D.H3
- Policy S.SG2
- Policy D.DH6

Design guideline 6

Sites should include a drop off zone near building entrances. Ideally this should be covered to provide protection during bad weather.



Drop off zone is immediately adjacent to the main entrance and is protected from weather.

● Buildings as systems

● Everyday life

A drop off space would support travel of the less able by reducing walking distances to enter the building.

It would also provide sufficient space for emergency service vehicles to access the building easily.

Some case studies included a drop off but the orientation of the drop off and entrance obstructed pedestrian legibility.

Policy links

- Policy S.SG2
- Policy D.DH2
- Policy S. DH1

Design guideline 7

Servicing and deliveries should be made within the site curtilage to not obstruct the public highway or cause excessive nuisance.

Ideally in single buildings this should take place within the building envelope. In larger sites or masterplans this should be located away from main pedestrian routes and public spaces.

Further Consideration

Servicing and delivery management plans to identify opportunities for virtual consolidation of deliveries to reduce the number of trips.



Ramp to access the basement is integrated into the building design. A platform lowers to basement level to carry bins up to the street level for collection without obstruction to the public highway or causing clutter.

Buildings as systems

As trends for online shopping continue, high density developments can generate a lot of trips putting pressure on the street network and on the concierge.

Policy links

- Policy D.TR4

The ground floor or street level of a high density development is where the building contributes to public life.

Interface

It serves as the interface between the public realm and the private community within the building.

Uses at the ground floor, that are accessible to both residents and the surrounding neighbourhood, provide public benefit.

Location of public uses such food shops, a nursery or spaces for work create environments where residents of both the building and the neighbourhood cross paths on a regular basis, fostering social integration.



Space can be used by residents of the building and surrounding area. Large windows increase visibility and activate the street.

London Plan

Policy GG1 Building strong and inclusive communities

B seek to ensure changes to the physical environment to achieve an overall positive contribution to London

C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation

Policy D3 Optimising site capacity through the design-led approach

B Development proposals should:

6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest

Policy D5 Inclusive design

B Development proposal should achieve the highest standards of accessible and inclusive design. They should:

2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion

Policy D8 Public realm

Development Plans and development proposals should:

G ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.

London Housing SPG 2016

Standard 8 - All main entrances to houses, ground floor flats and communal entrance lobbies should be visible, clearly identifiable, and directly accessible from the public realm.

Standard 10 – Active frontages should be

maximised and inactive frontages minimised on the ground floor of buildings facing publically accessible space, in order to provide natural surveillance and activity.

Local Plan

Policy S.SG2 Delivering sustainable growth in Tower Hamlets

- 1. Development will be supported and is considered to contribute towards delivering the Local Plan vision and objectives and to be sustainable where it:*
 - b. shares the benefits of growth, through:*
 - i. contributing to creating healthy environments - encouraging physical activity, promoting good mental and physical wellbeing and reducing environmental factors which can contribute to poor health, including poor air quality.*
 - ii. creating mixed and balanced communities.*
 - iii. delivering tenure-blind developments.*
 - iv. increasing opportunities for social interaction.*
 - v. providing local training or employment opportunities in either, or both, the construction and end use.*
 - vi. delivering social and transport infrastructure and public realm improvements which are inclusive and accessible to all.*

Policy D.DH6 Tall Buildings

1. Developments with tall buildings must demonstrate how they will:

h. present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level

Policy D.DH2 Attractive streets, spaces and public realm

2. Development is also required to positively contribute to the public realm through:

a. optimising active frontages towards public streets and spaces

Design guideline 8

When appropriate, in compliance with Local Plan designations, part of the ground floor should provide uses that are available to both residents of new development and from the surrounding neighbourhood such as shops, restaurants and community facilities.



A community centre improves the contribution of the building to the neighbourhood, activating the ground floor and improving social integration.

Mixed and balanced communities

Most case studies included some form of active use at the ground floor, these were almost all universally praised with many wishing more were available.

However, resident interviews expressed the desire for greater diversity, particularly cheaper food or specialist businesses.

Public uses at the street level including shops, childcare, cafes and community rooms, create more active engagement, vibrancy and street life.

64% of those questioned as part of the neighbourhood survey did not think residents of the neighbouring high density development was part of the

community. This varied widely however, from 8-92%. Schemes that provided community uses were felt to be more part of the community.

82% of residents living around the building had never used facilities within it, although 32% of these would be interested.

54% of residents living around a high density building thought it contributed to a lively environment for example by having residential entrances with people coming and going, commercial activity and/or you can see what happens inside the building from the outside.

Policy links

- Policy S.SG2
- Policy D.DH6
- Policy D.DH2

Design guideline 9

Communal residential entrances should be located on main streets or prominent locations.

Articulation and external finishes of the residential entrance should be visually distinctive.



Tiling, signage and lighting is distinctive and creates character.

● Everyday life

● Children and young people

Distinctive entrances improve orientation and wayfinding around the building, particularly for children and young people, those with poor eye sight and dementia sufferers.

● Everyday life

● Buildings as systems

23% of residents we spoke to found that visitors and delivery people sometimes struggle to find entrances and their way into the building.

Policy links

- Policy D.DH2
- Policy D.DH6

Design guideline 10

Where appropriate incorporate childcare facilities such as a nursery or crèche at the lower floors accessible to all tenures and neighbouring residents

Design should provide appropriate learning spaces, including external play space. Flexible design should allow for easy conversion to alternative appropriate uses if demand for childcare is low.



Childcare's outdoor space is located on the first floor by taking a 'bite' out of the building.

Mixed and balanced communities

Affordable and accessible child care creates a sense of community, fostering interaction between residents of different ages across the neighbourhood.

Childcare facilities supports working parents, improving equality, productivity and health.

Children and young people

Childcare facilities near the home increase the quality of life for both parents and children.

A location near transit routes reduce commute times. Connection to a good pedestrian network allows parents with children to comfortably walk or cycle to the childcare facility.

Everyday life

Childcare facilities, particularly if co-located with other communal uses or homes for the elderly fosters intergenerational interaction and improves mental and physical wellbeing.

Policy links

- Policy S.DH1
- Policy D.CF3

Design guideline 11

The building at the street level should maximise active frontages. This can be achieved through residential entrances, public uses, and permeable facades. Ancillary uses should not result in dead facades. If these must be located at street level they should be animated through, for example, decorative screens.



Decorative panelling in front of louvres improves the contribution of the building at street level.

● Mixed and balanced communities

● Everyday life

● Buildings as systems

Active frontages provide a more vibrant street life.

They provide overlooking and informal supervision of streets and the public realm improving sense of safety.

54% of residents living around a high density building thought it contributed to a lively environment for example by having residential entrances with people coming and going, commercial activity and/or you can see what happens inside the building from the outside.

Policy links

- Policy D.DH2

Systems refer to the resource flows around a high density development. The high population and climate crisis places significant pressure on the management of resources.

Waste

There are a variety of approaches to waste collection suitable for high density schemes. However all should support the greater separation of waste, be easy to deliver and collect, include sufficient storage to hold waste for the development for a minimum of one week and be well integrated into the building and public realm design.

Waste should not be collected from the public highway. Accordingly, there is strong preference for vacuum and underground storage systems that are better integrated into the public realm and avoid clutter.

The following provides design guidelines for potential waste management options.

Climate change

The public realm and landscaping should create multifunctional green spaces. These should operate as sustainable urban drainage to adapt and mitigate to climate change. Design must also be sufficiently robust as to be playable and encourage biodiversity.

Water

Developments should seek to minimise pressure on the water network as part of steps to adapt and mitigate against climate change.

As population numbers are high, there is scope to contribute to improved health and wellbeing and a reduction in the use of single waste plastics through the provision of public water fountains.



Rooftop design incorporates sustainable urban drainage and a range of habitats

London Plan

Table 3.2 Qualitative design aspects to be addressed in housing developments

Usability and ongoing maintenance recycling and waste disposal, storage and any on site management facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services.

Policy D8 Public realm

Development Plans and development proposals should:

I incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity.

O ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm.

Policy SI7 Reducing waste and the circular economy

B Referable applications should promote circular economy outcomes and aim to be net zero-waste.

6) design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

London Housing SPG 2016

Standard 22 - Communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection. Refuse and recycling stores within buildings should be located to limit the nuisance caused by noise and smells and maintained to a high hygiene standard.

Standard 23 - Storage facilities for waste and recycling containers should be provided in accordance with local authority requirements and meeting at least British Standard BS5906:2005 Code of Practice for waste management in Buildings.

Standard 34 (and Policy 5.3) - All homes should satisfy London Plan policy on sustainable design and construction and make the fullest contribution to the mitigation of and adaptation to climate change.

Local Plan

Policy D.MW3 Waste collection facilities in new development

2. New major residential developments must incorporate high quality on-site waste collection systems that do not include traditional methods of storage and collection and are compatible with our waste collection methods

Policy D.ES5 Sustainable drainage

1. Development is required to reduce the risk of surface water flooding, through demonstrating how it reduces the amount of water run-off and discharge from the site through the use of appropriate water reuse and sustainable drainage systems techniques.

2. Major development is required to submit a drainage strategy which should demonstrate that surface water will be controlled as near to its source as possible in line with the sustainable drainage systems hierarchy.

Policy D.DH2 Attractive streets, spaces and public realm

g. integrating refuse and recycling facilities within the building envelope

Design guideline 12

If underground bin systems are proposed:

- Intake hatches should be adjacent to residential entrances.
- Sufficient space should be provided surrounding containers for manoeuvre of specialist vehicles including consideration of tree canopies.
- Locate away from outdoor amenity space and outdoor play space.
- Treatment of underground store to be integrated into public realm design, the top of the underground store should be level, materials should be distinct but complementary to the public realm.
- Capacity should be based on waste capacity guidelines; there should be sufficient storage to hold waste for the development for a minimum of one week.
- Incorporate clear signage on the bins.



Underground bin system integrated into the public realm with clear signage.

● Everyday life

Underground bin collection systems have already been implemented in Tower Hamlets as part of the Aberfeldy Regeneration and the retrofit of Teviot Estate.

Underground bin systems reduce clutter in the public realm, improve the ease of access to refuse stores and encourage residents to use the refuse facilities correctly reducing costs of waste management and improving recycling rates.

Underground bins are easier to use by residents in wheelchairs or young children.

Policy links

- Policy D.MW3

Design guideline 13

If a vacuum system is proposed:

- Intake hatches adjacent to residential entrances.
- Intake hatches in waste rooms at each floor
- Incorporate clear signage on the bins.
- Capacity should be based on waste capacity guidelines; there should be sufficient storage to

hold waste for the development for a minimum of one week.

- Paving surrounding the intake hatches correspond with the existing public realm.



Envac System integrated into the public realm using similar material finishes.

**Everyday life**

Vacuum waste systems reduce clutter in the public realm, improve the ease of access to refuse stores, encourage residents to use the refuse facilities correctly, reducing costs of waste management and improving recycling rates and reduces conflict between waste collection vehicles and residents in the public realm.

Vacuum hatches are easier to use by residents in wheelchairs or young children.

Policy links

- Policy D.MW3

Design guideline 14

Traditional waste systems are not supported by the Local Plan and will be resisted. If following supporting evidence and confirmation by the Tower Hamlets Waste Team they are proposed:

- Waste collection should not obstruct the public highway.
- Specialist space should be incorporated preferably at the street level within the building envelope for temporary storage of bins for collection.



Euro Bins separate from the public highway and public realm.

Buildings as systems

8/9 of case studies use traditional waste collection systems. Here, bins are stored in the basement and carried outside the building for collection.

This results in obstruction, clutter in the public realm and untidiness.

Some interviewees identified issue with smell where many bins are placed along pedestrian routes in the neighbourhood.

Policy links

- Policy D.MW3

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Design guideline 15

Approach to landscaping and public realm should be multifunctional. It should incorporate sustainable urban drainage, increase biodiversity and urban greening and be robust enough to be playable.

Further Consideration

See GLA's Sustainable Design and Construction SPD and GLA's Play and Informal Recreation SPD.

See CIRIA guidance on the planning, design, construction, operation and maintenance of SuDS.



Public realm incorporates a biodiverse rain garden, water retention and detention features and pervious surfaces. This is integrated with playable public art.

● Children and young people

Robust, multifunctional green infrastructure can create environments suitable for play, extending the playable area of a development.

Access to nature supports childhood development and increases the likelihood of other pro-environmental behaviours.

Only 29% of residents we spoke to who live around the building use spaces around the building with their children for play, rest or exercising.

● Everyday life

Green infrastructure and biodiversity creates attractive environments that are beneficial for mental and physical well-being.

● Buildings as systems

Sustainable urban drainage can mitigate and increase resilience to potential flood events and increase biodiversity.



Public space incorporates a basketball, skateboarding features and seating but functions as flood water collection pools in storm conditions.



SUDs detention basin incorporated into public realm.

Healthy neighbourhood

Water and greening can counter the urban heat island effect.

Policy links

- Policy S.DH1
- Policy S.DH2
- Policy D.OWS3
- Policy D.ES3
- Policy D.ES4
- Policy D.ES5
- Policy D.ES6

Design guideline 16***London Plan Policy SL13 Sustainable Drainage***

Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)



University building collects and treats rainwater for re-use for non-potable water applications such as toilet flushing.

Buildings as systems

Use of collected rainwater reduces demand and therefore pressure on water resources.

Policy links

- Policy D.ES6

Design guideline 17

London Plan Policy D8 Public Realm

Development Plans and development proposals should:

ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm.



Public water fountain

Everyday life

Drinking fountains support health and well being.

Buildings as systems

Drinking fountains reduce unnecessary plastic waste.

Policy links

- Key objective 2-8

The massing, orientation and design of the building and the location of public spaces contributes to a high quality urban microclimate promoting comfort and well-being. It should be designed to achieve good levels of solar access, wind and thermal comfort, whilst reducing exposure to areas of poor air quality. and high levels of air quality. Resilience to climate change and biodiversity improvements should also be key design drivers.

Daylight and sunlight

Direct sunlight in the spaces around buildings is important to support well-being, outdoor activities, children's play, support healthy planting, reduce humidity and dampness and generally improve the appearance of external areas.

Wind

High velocity winds in urban corridors or downdraughts generated by high rise buildings can significantly affect pedestrian comfort.

Air quality

Massing and location of outdoor spaces should prioritise the health of residents by reducing exposure to areas of poor air quality.

Urban greening and biodiversity

A significant increase in soft landscaping is necessary to adapt to the impacts of climate change including extreme temperatures, the urban heat island effect and flood events. Soft landscaping also improves urban spaces contribution to biodiversity and mental wellbeing.

Biodiversity net gains can be met in various ways, however tall buildings in particular can play a role in supporting specific species such as Peregrine falcons and other priority species identified in the Tower Hamlets Biodiversity Action Plan.



Rooftop with extensive biodiverse landscaping

London Plan*Policy D7 Public realm*

I incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity.

J ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place.

*Policy D3 Optimising site capacity through the design-led approach**B Development proposals should:*

- 9) help prevent or mitigate the impacts of noise and poor air quality*
- 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use*

Policy G5 Urban greening

A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy G6 Biodiversity and access to nature

D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

London Housing SPG 2016

Standard 33 (and policy 7.14) - Minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality

Management Areas (AQMAS).

Standard 39 (and Policies 5.11 & 5.13) New development should incorporate Sustainable Urban Drainage Systems and green roofs where practical with the aim of achieving a Greenfield run-off rate, increasing bio-diversity and improving water quality.

Surface water run-off is to be managed as close to source as possible.

Standard 40 (and Policy 7.19) - The design and layout of new residential development should avoid areas of ecological value and seek to enhance the ecological capital of the area in accordance with GLA best practice guidance on biodiversity and nature conservation.

Local Plan*Policy D.DH6 Tall Buildings*

- 1. Developments with tall buildings must demonstrate how they will:*
 - j. demonstrate that the development does not adversely impact on the microclimate and amenity of the application site and the surrounding area*

Policy D.ES10 Overheating

- 1. New development is required to ensure that buildings (both internally and externally) and the spaces around them are designed to avoid overheating and excessive heat generation, while minimising the need for internal air conditioning systems.*

Policy D.ES2 Air Quality

- 4. New build developments which propose to provide any private, communal, publicly accessible open space or child play space in areas of sub-standard air quality are required to demonstrate that they have considered the positioning and design of the open space to reduce exposure of future users to air pollution.*

Policy D.ES3 Urban greening and biodiversity

Design guideline 18


The development of typologies and massing should ensure adequate levels of daylight and sunlight to amenity spaces and public realm (Local Plan D.DH8).

Dependent on context and typology this could be achieved through:

- locating taller elements towards the north of the site or block
- stepping massing to maximise light into a courtyard
- providing sufficient distances between blocks and within courtyards

Existing standards

External areas should achieve BRE 209 guidance for solar access, with a minimum of 2 hours of sunlight over half the area on the equinox.

 **Healthy neighbourhoods**

Tall buildings can significantly overshadow external spaces around buildings and public realm. Solar access can be improved by locating taller buildings to the north side of external spaces requiring good access to sunlight, or avoiding continuous obstructions with the inclusion of 'breaks' between buildings.

20% of residents we spoke to who live around high density buildings do not think the external environment around them is pleasant. 35% think it has blocked sunlight.

Policy links

- Policy D.DH8

Design guideline 19


Buildings over 30 metres in height and/or substantially taller than the surrounding area and/or over 150 units must be tested against the industry standard Lawson criteria in relation to wind (Local Plan D.DH6).

These might require the need for mitigation measures. Dependant on context and typology this could be achieved through:

- offset taller elements so the lower element (podium or courtyard block) serves to deflect wind
- when wind mitigation cannot be achieved through the building massing recess entrances or use canopies to deflect wind from entrances or adjacent open spaces, the design should be integrated into the building language and materiality or consider recess
- if wind cannot be deflected and impacts public realm, podiums or rooftops use trees or street furniture such as a pergola or large planter

Existing standards

Mean wind speeds of 0-2m/s are acceptable for seating areas, 2-6 m/s for entrances to buildings and 6-8m/s for public footpaths and public spaces.

 Healthy neighbourhoods

The massing of building and street should follow best practice principles defined within the BRE 380 Guidance, and supported by wind modelling studies.

Tall buildings can create significant downdraught and localised high windspeeds at ground levels. This can significantly affect pedestrian comfort and safety. The effects must be assessed with an appropriate modelling technique and mitigated.

20% of residents we spoke to who live around high density buildings do not think the external environment around them is pleasant. 32% feel it has worsened wind.

Policy links

- Policy D.DH8
- Policy S.DH1
- Policy D.DH6

Design guideline 20**Local Plan Policy D.ES2**

New build developments which propose to provide any private, communal, publicly accessible open space or child play space in areas of sub-standard air quality are required to demonstrate that they have considered the positioning and design of the open space to reduce exposure of future users to air pollution.



External cladding has anti-microbial and de-polluting properties to filter the surrounding air.

Healthy neighbourhoods

Across the borough 7% of all deaths in people over 30 are attributed to particulate air pollution.

From interviews, residents near main roads were aware of the impacts on their health and thought mitigation measures such as winter gardens and ventilation would be beneficial.

An ambient breeze can also significantly help with flushing air pollutants. This needs to be promoted through optimisation of the building massing and orientation.

Policy links

- Policy D.DH8
- Policy S.DH1
- Policy D.DH6
- Policy D.ES2

Design guideline 21

High density developments and tall buildings should encourage biodiversity through the provision of bird and bat boxes and habitat features for insects.

Bat boxes should face south or west, be above 3 meters high but not the upper floors of a tall building.

Bird boxes should generally face north or east, be above 3 meters high but not the upper floors of a tall building.

Planters or biodiverse roofs could include piles of stones, logs or specially designed insect 'hotels'.

More specific needs require:

Swift boxes should be above 5 metres high with uncluttered airspace in front of them.

Artificial house martin nests should be located under an overhang.

Black redstart nest boxes should be located close to biodiverse roofs.

Peregrine boxes should be on the top of the tallest building around and located where access for maintenance between March and August is unlikely to be required.



● Buildings as systems

● Healthy neighbourhoods

Many residents were aware of biodiversity loss and complained their neighbourhoods felt like a concrete jungle.

Supporting biodiversity in the inner city requires creating a varied network of habitats. Tall building typologies in particular offer opportunities to support specific species such as Peregrine falcons that are outlined as priority species in the Tower Hamlets Biodiversity Action Plan.

Policy links

• Policy D.DH8 • Policy D.ES3

Design guideline 22

Design should maximise soft landscaping to increase biodiversity, improve green infrastructure and the urban greening factor, address the urban heat island effect and support physical and mental wellbeing.

This should include:

- Varied, climate resilient, planting with a range of nectar rich perennials that flower throughout the year.
- Drought and wind tolerant species at the upper floors.
- Biodiverse or bio-solar green roofs.
- Avoid the use of astro-turf.
- Planting selected to not obstruct winter sunlight.

Innovative approach to biodiversity and urban greening are encouraged.

This may include:

- Planters incorporated into the design of facades.
- Planters incorporated into street furniture such as seating, cycle parking and hostile vehicle mitigation measures.
- Green walls

Further Consideration


Plant species list - RHS Perfect for Pollinators
London Biodiversity Partnership - Design for Biodiversity


Further Consideration

Biodiverse and green roofs - Substrate should range in depth from 80mm and 120mm to give varied topography and hence microclimates. They should be sparsely sown and/or plug-planted with appropriate wild flowers. Piles of stones or logs provide additional habitats. If a roof is overlooked, habitat features can be arranged in interesting patterns.

Further Consideration

Green walls achieved by planting climber species are easier to maintain with less irrigation requirements than modular green wall systems.

 Healthy neighbourhoods

 Buildings as systems

A high proportion of Tower Hamlets is deficient in access to open space and many residents interviewed complained that their neighbourhood lacked access to green spaces and wanted more greening and trees, a view now likely increased as a result of COVID-19 lockdown.

Biodiverse green spaces have wide ranging benefits including addressing species loss, adapting and mitigating to climate change such as drought and flood events and supporting the wellbeing of residents.

Policy links

- Policy D.DH8
- Policy D.ES3



Deciduous trees over seating provide shaded spaces to rest in the public realm.



Deciduous trees provide privacy and improve outlook but do not obstruct winter sunlight.

2. Communal spaces

2.1 Outdoor

Primary space
Secondary space
Design

2.2 Play

Design
Location

2.3 Indoor

Location
Design
Facilities

2.4 Circulation

Entrances
Lobbies
Lifts and stairs
Corridors
Doors

2.5 Systems

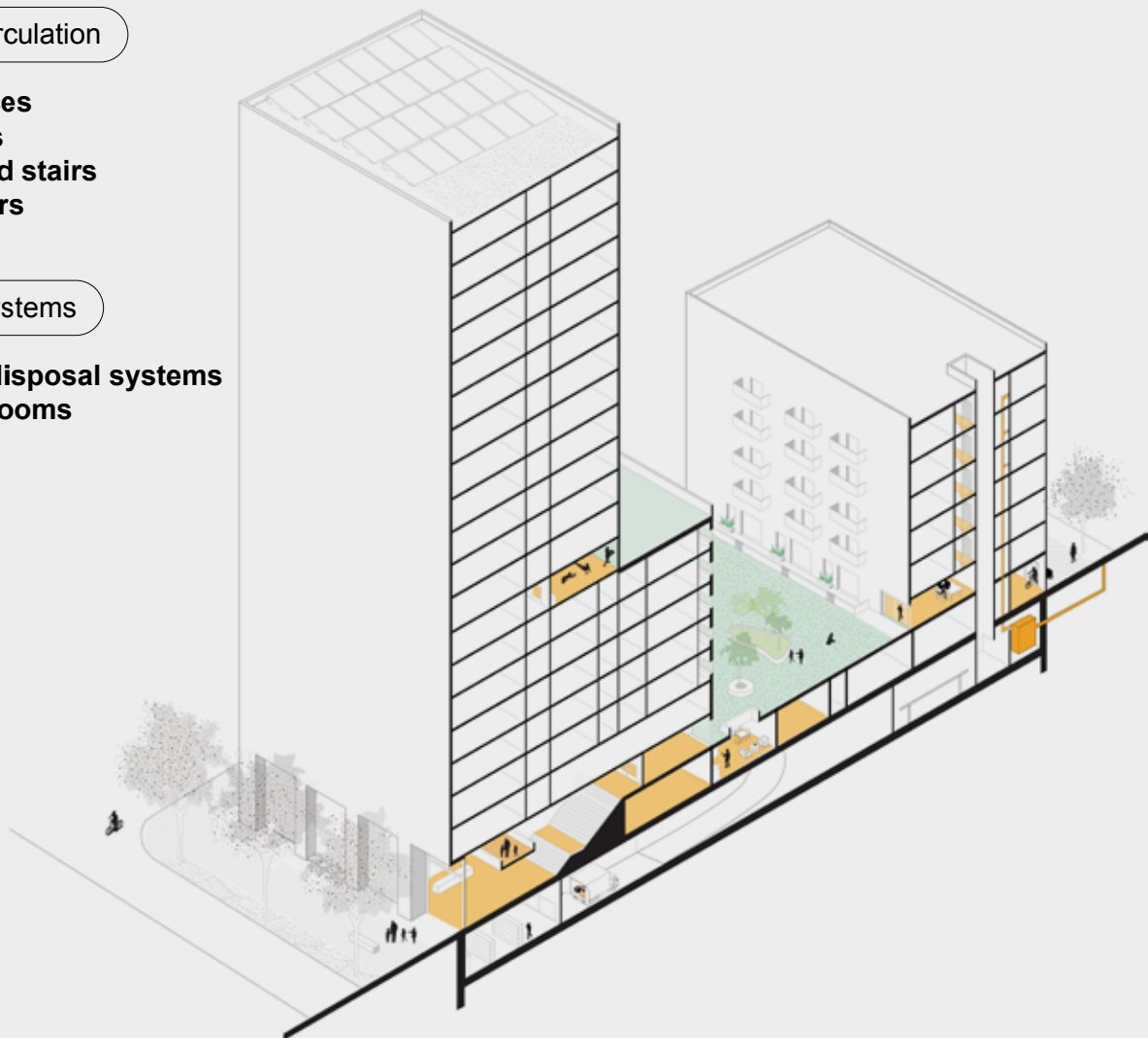
Waste disposal systems
Waste rooms
Water
Energy

2.6 Cycling

Cycle stores

2.7 Staff facilities

Staff and contractors
Deliveries



Communal space including play space, communal amenity space and building circulation are key to delivering a high quality of life at high density. As there is greater pressure on space in these environments they should be multi-functional but this should not result in double counting. For example, communal amenity space should be playable but this should not detract from the spaces primary role or count towards play space.

Children and young people

Child friendly environments are not restricted to the home, school or play space. Play occurs everywhere and is an essential part of development. Although specific play areas should be provided, the design and layout of communal and circulation spaces around the building should provide the right environment for play to occur naturally and families to move around with ease. Design should encourage independence, so independent movement and play becomes a regular feature in the lives of children living at high density.

Mixed and balanced communities

In order to facilitate integration and build balanced communities, high density development should provide spaces to meet.

These should include formal spaces such as outdoor communal amenity space and play space and programmed events. In addition, circulation spaces in and around the building should foster regular informal interaction.

Research on nine high density case studies across the borough found corridors and entrance lobbies were the primary location where residents meet and get to know each other. Design should therefore acknowledge and support this.

Everyday life

Existing London and Local Plan policies require that communal spaces support social activity and meet changing and diverse needs. Research finds that circulation spaces, particularly the lobby and corridors, have an important role in residents well-being. Access to nature is also beneficial for mental and physical well-being.

Needs of residents change over time, uses, design and specification should therefore consider potentialities from the offset to avoid later upgrade costs, resident stress or the need to move.

Buildings as systems

The design of communal spaces, particularly circulation spaces around the building can help or hinder the effective and regular use of building systems and services. In particular, waste disposal and cycling rates. The design of waste systems and cycle infrastructure should therefore be future proof and offer flexibility to support changing needs.

High Density Developments, particularly Tall Buildings, also require more extensive management to deal with the large population and their various needs. Good design to support building managers and staff will again increase efficiency, reduce costs and foster a sense of community.

Healthy neighbourhood

Indoor and outdoor communal spaces must perform to high environmental standards to support the health of residents, adapt and mitigate to climate change and to create attractive and comfortable spaces residents wish to linger. This is achieved through the orientation and massing of the building as well as the approach to landscaping and indoor spaces.

Time outside is positive for both physical and mental well-being. Development should contribute to the creation of healthy outdoor spaces.

Quantity

Quantity refers to the area of communal space and how they are distributed around the building. To foster social integration these should be shared between all residents.

Primary space

Space required for communal amenity at high density is high, meeting this should drive the development of the massing. A centralised main communal space is most well used and effective for social integration, management and maintenance. This would be the primary amenity space.

Secondary space

Smaller, secondary, communal spaces can support more regular interaction between residents, aiding familiarity and opportunities for

interaction and friendship.

Design

Landscaping must be multi-functional. Design should foster social interaction but not impede on privacy. It should encourage physical activity but also serve as a place of rest.

Planting and green spaces improve biodiversity and resistance to impacts of climate change.

If high density is to become a meaningful housing option for more people it should acknowledge pet ownership. Considered design can make environments more comfortable, reduce wear and tear and avoid conflict between different residents.

Environment

Environmental policies for outdoor spaces are addressed in section 1.5.



Spacious, biodiverse, communal amenity space.

London Plan

*Policy D6 Housing quality and standards
3.6.6 Housing developments should be designed to maximise tenure integration*

London Housing SPG 2016

Standard 4 - Where communal open space is provided, development proposals should demonstrate that the space: is overlooked by surrounding development; is accessible disabled people including people who require level access and wheelchair users; is designed to take advantage of direct sunlight; has suitable management arrangements in place.

Standard 5 (and Policy 3.6) – For developments with an estimated occupancy of ten children or more, development proposals should make appropriate play provision in accordance with the Mayor’s Play and Informal Recreation SPG.

Tower Hamlets Local Plan

*Policy D.H3 Housing standards and quality
c. for developments with 10 or more residential units, the minimum communal amenity space (excluding circulation areas, access routes and waste or bike storage) should be 50 square metres for the first 10 units plus a further one square metres for every additional unit thereafter.*

Design guideline 23

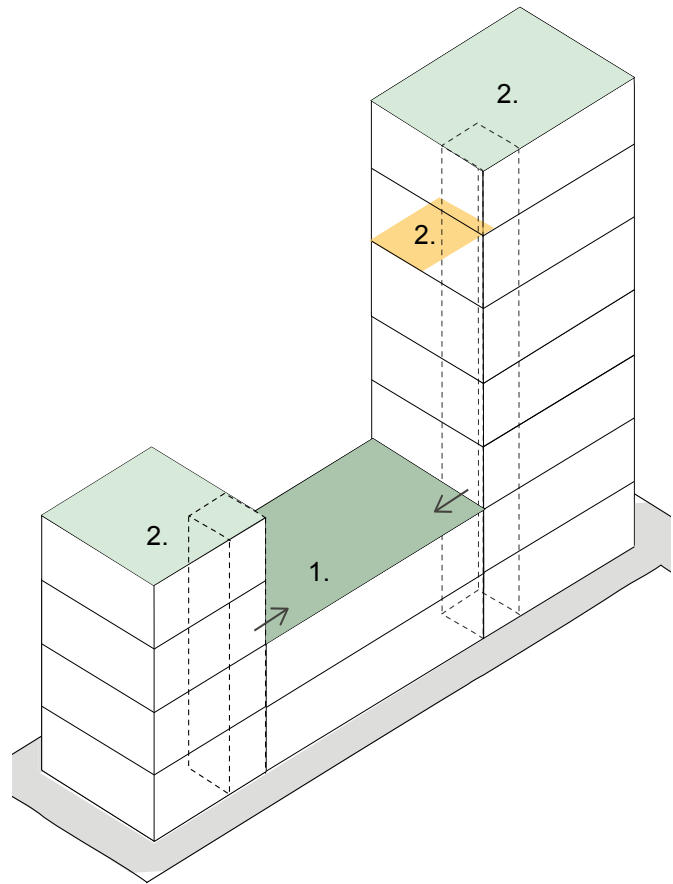
All communal amenity space should be shared between different housing tenures. Where this is not possible, the majority of communal amenity space must still be shared.

To avoid the burden of shared communal space falling on one tenure, this space should be provided proportionately to the number of homes and number of residents each space serves. It should be easily accessible by all housing tenures.

The shared space constitutes the primary communal amenity space. Other communal amenity spaces constitute the secondary communal amenity space.

Further Consideration

Events to foster the social integration of residents and create a sense of belonging should be programmed in communal amenity spaces. These must consider different faiths, cultures and finances to avoid excluding particular groups.



Breakdown of communal amenity spaces.
 1. Primary communal amenity space.
 2. Secondary communal amenity space.

Mixed and balanced communities

38% of residents we spoke to state their building lacks a sense of community. This rose to 53% for owner occupiers and 64% for those on higher incomes.

Interviews with residents living in the affordable section of a building particularly felt excluded when they could not access certain spaces. This reinforced inequality.

Shared facilities avoids establishing a hierarchy between residents of different tenures. They encourage residents of different tenures and blocks to cross paths on a regular basis.

Mixed and balanced communities

Programming events in communal amenity spaces increases opportunities for different residents to interact.

From interviews a number of case studies did host resident events but these could be exclusionary due to the focus on alcohol or cost.

Policy links

- Policy S.SG2
- Policy D.H3
- Policy S. DH6

Design guideline 24

The primary communal amenity space should be accessed from main routes from residential entrances to the home. It must be well overlooked and be directly adjacent and visible from building lobbies.



Indoor and outdoor communal spaces are accessed off routes to the home.

Mixed and balanced communities

Good level overlooking provides natural surveillance and increases the sense of safety by reducing the likelihood of anti-social behaviour.

From interviews, when communal amenity space was provided it was not well used if it was difficult to access. Difficult includes convoluted routes, distance and no visibility.

Space where homes faced or opened out on the communal amenity space were more used.

Everyday life

Direct access from the lobby, rather than convoluted routes, makes accessing communal amenity space a more regular part of everyday life.

Being able to see the space and view what is going on reduces stress, particularly for dementia sufferers and those with learning difficulties.

Buildings as systems

Good visibility improves ease of management, reducing management costs and instances of anti-social behaviour.

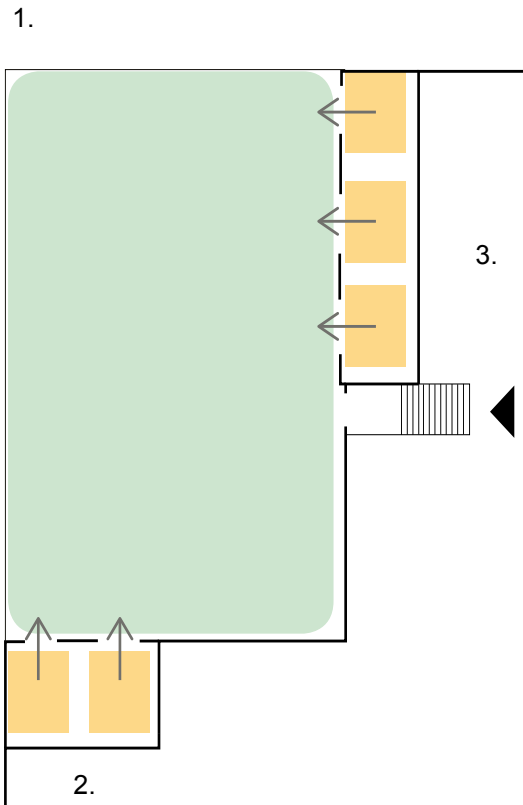
Policy links

- Policy D.H3

Design guideline 25

The majority of the primary amenity space is to be provided outdoors.

If some primary amenity space is indoors, it would be preferable that the space open out onto the outdoor primary amenity space to promote use and activation of the spaces.



Indoor communal rooms front and open out onto the outdoor primary communal space

Communal spaces are near to the building lobby for views out onto the space, overlooking and ease of management.

- Mixed and balanced communities
- Children and young people
- Everyday life

- Everyday life

The close proximity of a mix of uses increases opportunities for people to meet and interact.

It also increases the visibility of various activities opening up opportunities to different residents. This would be particularly beneficial if more time is spent in the home.

The flow of people and passive surveillance increases safety.

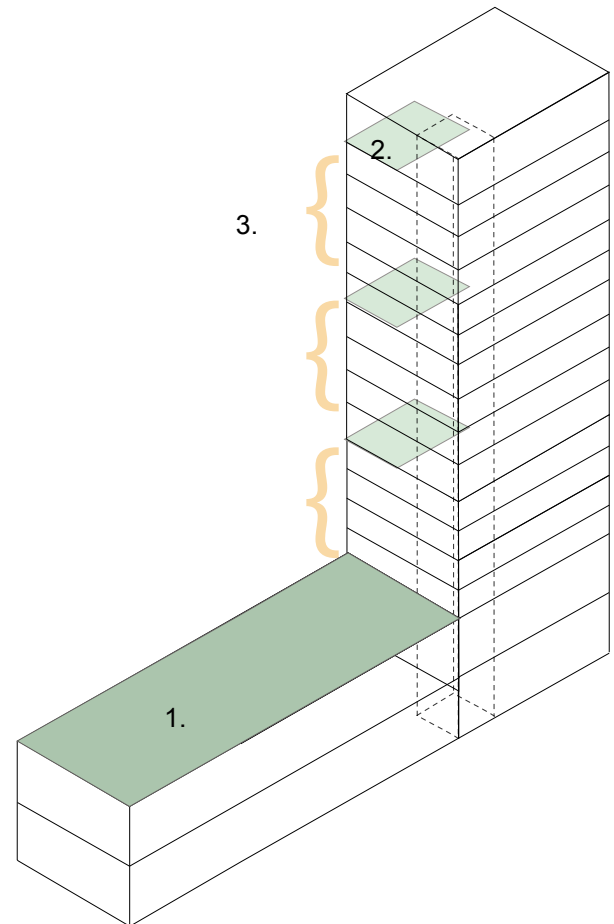
COVID-19 lockdown highlighted the importance of access to green outdoor spaces for health and wellbeing.

Policy links
• Policy D.H3

Design guideline 26

If secondary communal amenity spaces are provided these should be distributed across the building to support more regular interaction between smaller groups of residents, aiding familiarity and opportunities for interaction and friendship.

Secondary amenity spaces can be outdoor or indoor spaces.



Secondary communal amenity spaces are distributed around the building.

1. Primary communal amenity space.
2. Secondary communal amenity space.
3. Subdivision of floors with access to each secondary communal amenity space.

Mixed and balanced communities

Familiarity and sense of community reduces as population increases.

To ensure use and sense of belonging some communal amenity spaces and facilities could be distributed around the building.

Passive surveillance of roof top spaces reduce the likelihood of anti-social behaviour.

Policy links
• Policy D.H3

Design guideline 27

Where possible, there should be some homes directly facing outdoor amenity space and outdoor play space. These should have direct access onto the space.

Private amenity space in the form of a terrace between the communal space and the home provides privacy and forms a threshold. The boundary treatment should be permeable.



Terraces front onto communal amenity space.

● Children and young people

Direct access to the communal amenity space increases the opportunities for children to play and increases independent mobility.

Only 22% of children played unsupervised across the case studies, however level of independence increased in schemes where the home opened directly onto play space.

● Mixed and balanced communities

● Everyday life

Communal outdoor amenity spaces with active frontages feel more vibrant and experience greater passive surveillance, improving safety.

A defensible space promotes a sense of ownership but also creates a buffer that improves the sense of privacy and retreat in the home.

Policy links

- Policy D.H3

Design guideline 28

The design of part of the outdoor amenity area should promote physical activity for example through the use of outdoor gym equipment and/or gardening.

If outdoor gym equipment is provided, this should:

- be integrated into the landscaping.
- accessible to all tenures.
- include a diverse range of equipment for all levels.
- running routes and tracks separate from other movement flows.

If communal gardening is provided, this should:

- consist of beds that are easy to install, move or remove according to demand.
- be adjacent to a water point, bin and seating.
- include access to designated storage space.
- be managed by residents.

Other approaches for the design of outdoor amenity areas that encourage good health will be encouraged.



Food growing in communal spaces.

Mixed and balanced communities

Multifunctional spaces encourage use by a variety of people fostering integration between residents of various ages and backgrounds.

Case studies show that areas where infrastructure such as allotments and gym equipment were provided were more frequently used.

Everyday life

In 2016/2017 22.8% of Tower Hamlets residents were classified as physically inactive.

Residents' interviews frequently raise concern over lack of space. They often would have to travel far from their home so activity was not part of their everyday life.

Gardening and regular exercise helps improve physical and mental health and fosters socialisation. It provides opportunities for contact with nature to learn about food growing and healthy diet.

Regular contact with nature is also associated with other environmentally friendly behaviour.

Policy links

- Policy S.SG2
- Policy D.H3
- Policy D.SG3

Design guideline 29

The design of part of the outdoor amenity areas should promote rest and relaxation.

This should include:

- Seating integrated into the landscaping. Half of the seating should be suitable for those with restricted mobility.
- Native planting that includes interesting texture, colour and scent.
- Design that incorporates open spaces to encourage informal uses.
- Water features where appropriate.
- Features that provide shade in the summer months such as a pergola or planting where appropriate.



Seating and water features create an area of respite.

Mixed and balanced communities

Children and young people

Everyday life

Contact with nature serves as an educational tool, It is associated with the development of more responsible citizens who exhibit more environmentally friendly behaviour.

66% of residents we spoke to thought their courtyard was attractive with 63% stating it was pleasant to look down onto the courtyard. Rates were lower for roof terraces. These outdoor spaces serve as respite from the high density so should work harder to achieve this.

38% of residents felt there was limited access to outdoor space.

Increased time outside near blue and green infrastructure and in contact with nature improves mental and physical wellbeing

Buildings as systems

Healthy neighbourhood

Native and natural planting improves biodiversity contributions and is part of biodiversity net gain targets. Green and blue spaces counter the urban heat island effect.

Large areas of soft landscaping serves as respite during hot temperatures. This is even more essential as temperatures rise due to the impacts of the climate crisis.

Policy links

- Policy S.ES1
- Policy D.ES3

Further Consideration

Areas of more use, such as adjacent to entrances and along main pathways, should be robust and pet friendly. For example, paw friendly material including grass and mulch and urine resistant plant species.



Materials resist showing signs of wear and tear.

● Everyday life

● Buildings as systems

Qualitative findings from resident interviews found that many tenancy agreements and leases do not allow for pets but that rules are circumnavigated and rarely upheld.

Considered design, particularly outside main entrances and along routes avoids wear and tear and reduces instances of conflict between different residents.

Policy links

• Policy D.DH2

Design guideline 30

Bins, with space for recycling and residual waste, should be provided and integrated into the landscape design.



The bin is integrated into the bench design, reducing clutter.

● Everyday life

● Buildings as systems

Bins encourage residents to clean up after themselves and their pets, reducing maintenance requirements.

Policy links

- Policy D.DH2

Design guideline 31

Outdoor space should incorporate composting. This could include:

- In vessel composting.
- Anaerobic digestors.
- Aerobic biodigestors.

Further Consideration

If possible, there could be a network of buildings that manage food waste collectively. This is more efficient, creating economies of scale.



Compost bin on residential roof top in Sydney.

Buildings as systems

Composting facilitates the transition to the circular economy, retaining nutrients in use for longer. This reduces waste sent to landfill and the release of greenhouse gas emissions at the landfill site.

Compost can be used to maintain the health of planting, reducing the need to buy in fertiliser.

Policy links

- Policy D.MW3

27% of residents surveyed across the nine case studies lived with children, defined as under 12, and/or young people, above 12. Space for stimulating play and socialisation is essential for development.

Design

Indoor environments are not a substitute for outdoor play. Play space should be stimulating and support a range of uses and ages.

Areas should be multifunctional. On top of designated play spaces, all outdoor space should be suitable for play, reflecting the diverse ways children navigate and use a space. Outdoor space can be playable whilst increasing biodiversity, urban greening and sustainable drainage.

Location

To make play a regular feature of everyday life for children at high density, spaces should be adjacent to other uses, well designed and well managed. This is particularly the case if rooftop spaces are proposed. This improves safety, ease of management and reduces instances of anti-social behaviour.



Play space is generous, stimulating and not fenced.

London Plan*Policy S4 Play and informal recreation.*

“Safe and stimulating play is essential for children and young people’s mental and physical health. It is not just an activity confined to playgrounds and play areas, but is something that can be done in all aspects of a child’s life, in a wide variety of locations and environments. Accessing opportunities for play, and being able to be independently mobile within their neighbourhood, is important for children and young people’s wellbeing and development.”

B Development proposals for schemes that are likely to be used by children and young people should:

1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile.

2) for residential developments, incorporate good-quality, accessible play provision for all ages. of aAt least 10 square metres of playspace should be provided per child that:

- a) provides a stimulating environment.*
- b) can be accessed safely from the street by children and young people independently.*
- c) forms an integral part of the surrounding neighbourhood.*
- d) incorporates trees and/or other forms of greenery.*
- e) is overlooked to enable passive surveillance.*
- f) is not segregated by tenure.*

3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently.

4) for large-scale public realm developments, incorporate incidental play space to make the space more playable.

London Housing SPG 2016

Standard 5 (and Policy 3.6) – For developments with an estimated occupancy of ten children or more, development proposals should make appropriate play provision in accordance with the Mayor’s Play and Informal Recreation SPG.

Local Plan*Policy D.DH6 Tall buildings*

1. Developments with tall buildings must demonstrate how they will:

- i. provide high quality private communal open space, play areas and the public realm (where residential uses are proposed) for which occupants of the building can use and where appropriate provide shared facilities at the ground floor level to encourage social cohesion.*

Policy D.H3 Housing standards and quality

4. Development is required to protect or re-provide existing amenity space (private, communal and child play space). Net loss of existing amenity space will be resisted.

- d. major developments should provide a minimum of 10 square metres of high quality play space for each child*
- e. the child yield calculator should be used to determine child numbers in a development.*

Design guideline 32

All of the minimum play space requirement for children under 12 should be provided on site and outdoors. Where there are demonstrable site constraints, play space for under five year-olds must be on site and older children's play space must be within the GLA's specified recommended distances.

The design of play space should meet Play England's 10 Play Design Principles.

Play design should incorporate principles of nature play; imaginative, unstructured and encourages interaction with natural materials and native vegetation.

Play England 10 Play Design Principles


Successful play spaces:

1. are designed for their site
2. are well-located
3. make use of natural elements
4. provide a wide range of play opportunities
5. are accessible to both disabled and non-disabled children
6. meet community needs
7. can be used flexibly
8. build in opportunities to experience risk and challenge
9. are sustainable and appropriately maintained
10. allow for change and evolution

GLA Play and Informal Recreation

Play for under 5's:


- Sensory landscaping
- Climbable objects and tunnels
- Fixed equipment
- Seating
- Sand and water features


 Children and young people

Child play and development experts state indoor play cannot be a substitute of outdoor play.

42% of residents we spoke to stated children played away from the development they lived in. They were not satisfied with provision in or adjacent to them. From interviews it was clear that this restricted regular access to play space. In case studies where play space was provided this tended to be segregated from other uses through location or fencing. It was not part of day to day life.


Children with special needs such as autism tend to prefer sensory play equipment and tunnels.

 Children and young people

 Mixed and balanced communities

Residents frequently raised lack of facilities and spaces for young people/teenagers and some felt there were links between gatherings and anti-social behaviour.

 Mixed and balanced communities

 Everyday life

Co-location and integration of different uses fosters interaction between residents of different ages and backgrounds. Interaction between the elderly and young children can be particularly beneficial for well-being.

GLA Play and Informal Recreation

Play for under 12's:

- Natural feel including level changes
- Equipment integrated into landscaping including climbable tree trunks and swings
- Space to legitimise informal sports and ball games such as a MUGA or basketball net
- Seating

Youth Space 12+:

- Space to legitimise informal sports and ball games such as a table tennis table, MUGA or basketball net
- Seating
- Shelter
- Provide some privacy but located on well used routes around the building



Climbable objects and fixed equipment are integrated into the landscaping.

Policy links

- Policy D.H3
- Policy D.DH6
- Policy D.ES3

Design guideline 33

If a MUGA is provided, this should:

- have a flexible design for a variety of activities
- two entry/ exit points
- be well overlooked
- if appropriate incorporate seating
- where possible co-located or integrated into other outdoor communal amenity space
- consider the use coloured paving and decorative treatment to boundary fencing
- down lit to improve use and safety with minimal disruption to nearby residents



MUGA has good visibility and can support a variety of uses.



A non standard MUGA design incorporating more diverse activities.

Children and young people

Childhood obesity rates is high in Tower Hamlets at 43% compared to the national average of 34%. This is part due to a lack of physical activity.

Residents' interviews frequently raise concern over lack of space for children and young people to use. They often would have to travel far from their home so play and activity was not part of their everyday life.

Observations suggest MUGA's are most commonly used by boys. Diverse activities, multiple entry points and seating can make the MUGA more accessible to all.

Policy links

- Policy S.SG2
- Policy D.H3
- Policy D.SG3

Design guideline 34

In addition to designated play space outdoor communal areas should be playable.

A playable space or feature is one where children and young people can legitimately use it for play and informal recreation.

This could include:

- Incidental play opportunities such as planting, level changes, boulders and logs.
- Public art.
- Open areas.
- SUDs (swales and river channels).
- Water features.



Features, such as elevated walkways, can be played on.

● Children and young people

Children and young people use and experience space differently, all spaces offer an opportunity for play.

● Mixed and balanced communities

● Everyday life

Co-location and integration of different uses fosters interaction between residents of different ages and backgrounds.

Interaction between the elderly and young children can be particularly beneficial for well-being.

Policy links

- Policy D.H3
- Policy D.DH2
- Policy D.ES5
- Policy D.DH6

Design guideline 35

Boundaries around play space for children under 12 years old should be low and permeable or informal. This may include landscape features such as mounds, seating or planting.

Further Consideration

Doors to external communal amenity space and play space should have an interface to call and open doors, to enable people who do not have key fobs to move around the building.



Play is integrated into the landscape, planting provides informal boundaries.

Children and young people

Hard boundaries overly delineate space and restrict flexible uses. They can also be unwelcoming.

However, disabled children and young people, such as those with autism can benefit from some recognisable boundaries and perceived impacts on safety.

Buildings as systems

Healthy neighbourhood

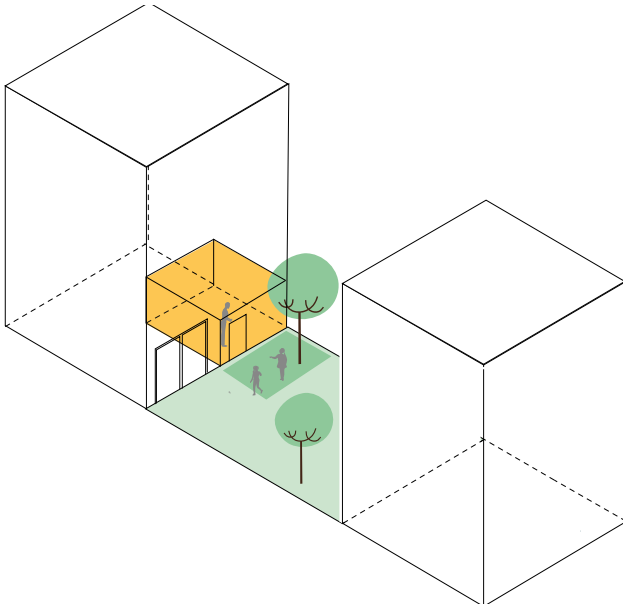
Multifunctional design can meet other policy requirements including biodiversity net gain, urban greening and sustainable urban drainage.

Policy links

- Policy D.H3
- Policy D.DH6
- Policy D.ES5

Design guideline 36

New development should demonstrate how they have considered the positioning of play space adjacent to or integrated with other public uses such as communal entrances, communal amenity space, indoor community rooms or commercial uses.



Indoor communal room next to play space facilitates informal supervision



Indoor communal rooms face out onto play space.

Children and young people

79% of residents we spoke to would only let their children play out of the home when supervised by an adult. 17% said this was due to play space being too far from the home with 12% stating it was because they could not see them at play.

Parents are more likely to let their children visit the play space if it is on their way to their home when entering the building and easily visible from their home.

Co-location of facilities increases regular use. Parents could access areas such as a communal laundry or a cafe whilst children play.

In case studies, where play space was provided this tended to be segregated from other uses through location or fencing. It was not part of day to day life.

- Mixed and balanced communities
- Everyday life
- Buildings as systems

Co-location of different uses fosters interaction between residents of different ages and backgrounds.

Regular use activates a space and helps develop a sense of belonging and community spirit. Regular use increases passive surveillance and therefore reduces the risk of anti-social behaviour issues.

Policy links

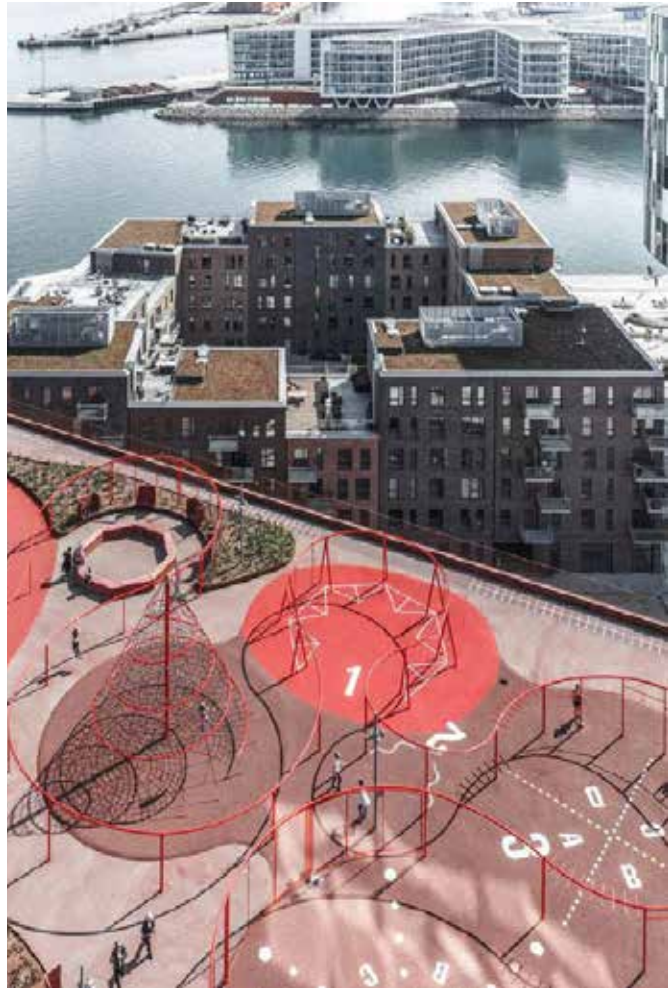
- Policy D.H3
- Policy D.DH6

Design guideline 37

Play space on rooftops will be resisted as they struggle to meet Play England's 10 Play Design Principles.

They will only be acceptable if:

- Development demonstrate how the play space meets Play England's 10 Play Design Principles
- Space is overlooked by enough most residential units.
- Wind assessment demonstrates lower impact levels.
- Co-located with other facilities such as indoor communal rooms, laundries and/or communal amenity space.
- Design should be safe and feel safe (parapet, balustrades above 1500mm, balustrades do not include horizontal elements that could be climbable).
- The design of boundary treatments such as fences, balustrades, parapets, etc. should be attractive and be part of the building language.
- Manage throughout the day outlined in the building's management plan. Indication of how the space will be managed in the building's management plan.



Play space includes a variety of equipment for different kinds of play and ages as well as colour and planting.

● Children and young people

36% of parents we spoke to did not let their child play unsupervised due to safety concerns.

Tower Hamlets members and child play experts find rooftop play and communal amenity space tends to be inadequate and most case studies with roof top play had to close soon after opening or are underused.

To be successful, roof top play requires extensive management.

Design should seek to mitigate safety concerns.



Play space is diverse and incorporates seating. Balustrades are high and cannot be climbed.

Policy links

- Policy D.H3
- Policy D.DH6

Existing London and Local Plan policies require that communal spaces support social activity and design and use can meet diverse and changing needs.

Home working is an emerging trend. Occupations go far beyond traditional desktop work and include other activities such as family care-givers, creches, beauty therapists and craftworkers. Flexible communal rooms have scope to support a good quality of work and home life.

Location

The presence of communal space and work space on key locations and routes increases use and opportunities for socialisation.

Design

Good visibility and spacious, comfortable rooms increases quality of life.

Flexible design including partition walls and storage means spaces can adapt according to resident demands.

Facilities

Communal facilities create the opportunity to externalise some activities from the home, so the home remains a space of privacy and relaxation.



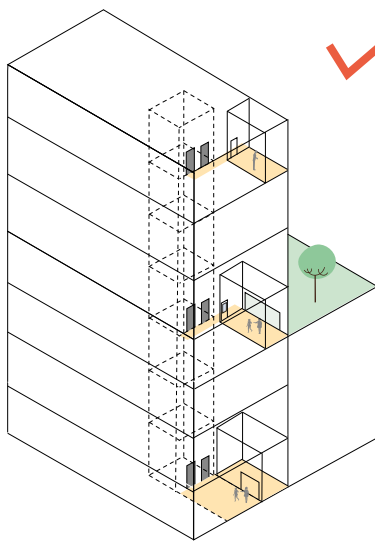
Indoor communal rooms open out onto outdoor space. Sliding doors blur the boundary between each space, providing activation.

Tower Hamlets Local Plan

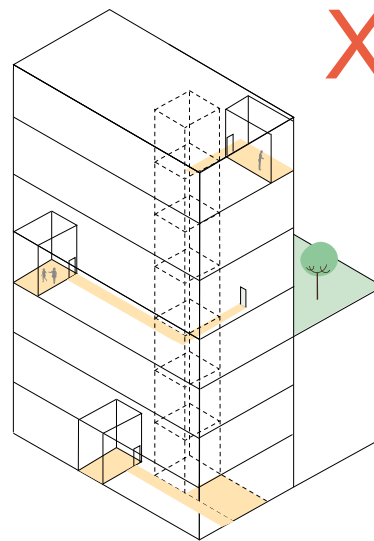
*Policy D.H3 Housing standards and quality
c. for developments with 10 or more residential
units, the minimum communal amenity space
(excluding circulation areas, access routes and
waste or bike storage) should be 50 square
metres for the first 10 units plus a further one
square metres for every additional unit thereafter.*

Design guideline 38

If communal amenity space is provided in the form of indoor rooms, the location should be legible. They should be located off central circulation spaces such as lift lobbies and ideally be adjacent to other communal areas.



Spaces located close to lift lobbies, visible as you exit the lift, located in same area on different levels and located adjacent to other communal amenity spaces.



Rooms far from the core, scattered throughout the building or not connected with other communal amenity spaces should be avoided.

Mixed and balanced communities

39% of residents we spoke to did not regularly use the communal room, when provided. 31% however did get to know their neighbours in this space.

A prominent location on regular routes throughout the building integrates the space into everyday life.

More regular use encourages residents to meet and socialise.

Buildings as systems

Mixed and balanced communities

In some case studies, communal rooms were not provided. This made it difficult for Resident's Associations to organise and run events.

Policy links

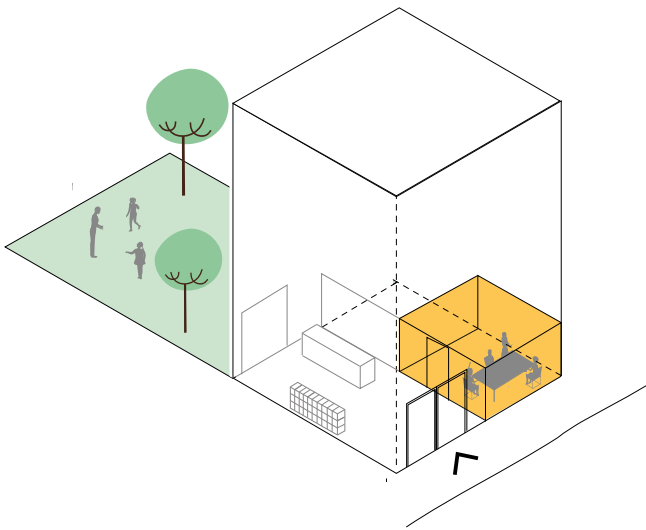
- Policy S.SG2
- Policy D.H3
- Policy S. DH1

Design guideline 39

Where possible, provide a smaller room, easily accessible from the entrance lobby, for private meetings with visitors.

Further Consideration

High density developments should support a Residents Association with representatives from all tenures.



Meeting room adjacent to the entrance lobby



A communal work space is suitable for meetings.

● Everyday life

● Buildings as systems

Both building managers and home workers meet with external people, often within the home. This can degrade a sense of privacy.

A meeting room functions as a space for residents to meet with visitors outside of the home and/or a space for the building manager to meet with external contractors.

Proximity to the entrance lobby increases safety by reducing the need for visitors to access the main building.

Policy links

- Policy S.SG2
- Policy D.H3
- Policy S. DH1

Design guideline 40

Indoor communal rooms should have visual connection from corridors and other communal spaces.



Doors with glazing or windows connect the communal room with corridors and other communal spaces.

● Mixed and balanced communities

● Everyday life

From circulation spaces it should be clear where communal indoor spaces are located and who is inside.

Visibility reduces stress and anxiety, particularly for those with learning difficulties and dementia sufferers.

Policy links

- Policy S.SG2
- Policy D.H3
- Policy S. DH1

Design guideline 41

Indoor communal amenity spaces should be generous and be designed to be used flexibly to maximise use throughout the day. For example, for different faiths, various types of home working and social activities.

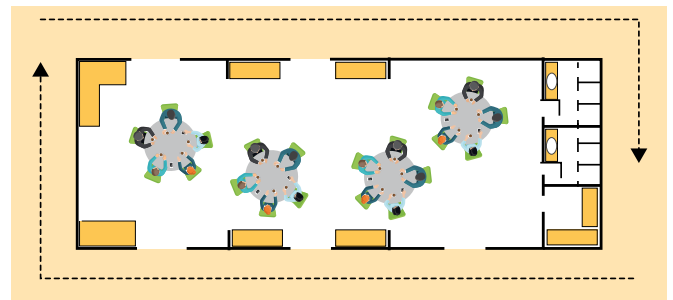
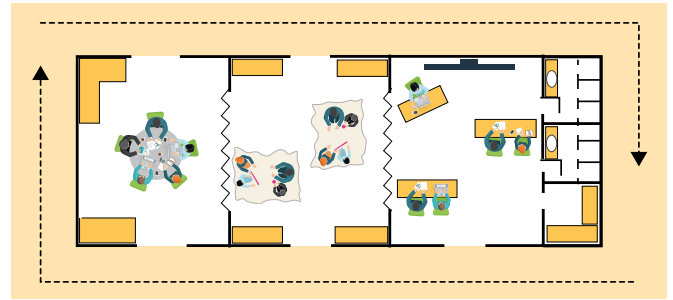
Flexibility can be achieved through the incorporation of:

- Partition walls.
- Regular placement of plugs.
- Sink.
- Storage space for equipment such as tables and chairs.

They should be naturally lit and well ventilated.

Further Consideration

Indoor communal rooms should be actively managed according to resident needs and interest and could be linked to the Residents Association. This should be addressed in a management plan.



Indoor rooms should be suitable for various types of home working but also use for social and faith based activities.

Mixed and balanced communities

Regular use and diverse activities better meets the need of a diverse population and increases opportunities for social interaction.

Everyday life

Home working is a growing trend. Provision of spaces suitable for a variety of work practices can reduce social isolation as well as clutter and conflict in the home.

Buildings as systems

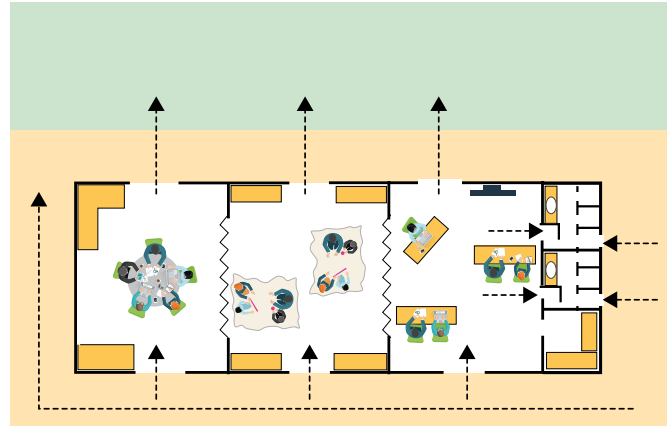
Everyday life

Over the life of the building, residents and their demands will change.

Flexible design means space can be re-purposed according to demand.

Design guideline 42

A shared toilet should be provided adjacent to communal amenity space where possible. The toilet should be accessible with provision for baby changing.



A toilet is provided and is accessible from multiple spaces and routes, increasing efficiency.

● Everyday life

Provision of a toilet means residents can use spaces comfortably for extended periods of time.

Toilets and sinks can assist if activities are messy, for example children's activities or a creative work practice.

Policy links

- Policy S.SG2
- Policy D.H3
- Policy S. DH1

Design guideline 43

A communal kitchen could be provided. This should include basic cooking facilities and be adjacent to a large space suitable for socialising.



The communal kitchen is spacious and includes a large space suitable for socialising.

**Mixed and balanced communities**

Sharing food brings people together. A communal kitchen creates a space where residents can organise and get together easily.

**Everyday life**

Small homes can make socialising difficult, for example hosting birthday parties. A specialist space can make this a more enjoyable experience and reduce conflict with neighbours.

Policy links

- Policy S.SG2
- Policy S. DH1
- Policy D.H3

Design guideline 44

Consider providing communal laundry rooms. These should be easily accessed from lifts, well lit and ventilated.

If communal laundries are not provided, typical residential layouts should outline how laundry can be conducted with minimal disturbance to other uses in the home such as providing a laundry cupboard.



The communal laundry is bright and well ventilated.

Mixed and balanced communities

Communal laundries provide opportunities for social integration.

Everyday life

Communal laundries free up space in the home and create a more relaxing home environment by reducing noise.

Buildings as systems

Communal laundries reduce energy and water consumption, the number of white goods in a development and risk related to the malfunctioning of white goods.

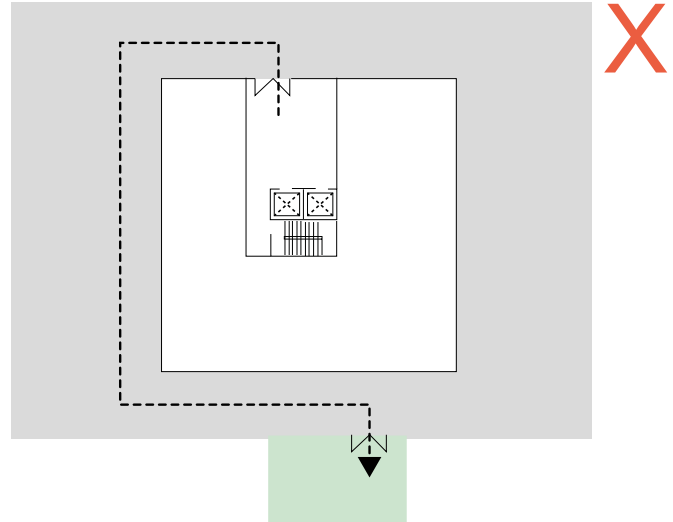
Policy links

- Policy S.SG2
- Policy D.H3
- Policy S. DH1
- Policy D.ES7

Design guideline 45

Residents should have access to outdoor and indoor communal amenity spaces without having to leave and re-enter the development.

Access should be easy and dignified for wheelchair users and those using mobility scooters.



Route to the communal amenity space is convoluted requiring residents to leave and re-enter.

● Everyday life

● Buildings as systems

From case studies there were instances where residents had travel outside around the building to access communal facilities. This restricted regular use.

● Everyday life

● Buildings as systems

23% of residents we spoke to found bike stores inconvenient. This rose to 55% of those living in the upper floors (20+). 24% found waste rooms inconvenient.

These were typically in the basement, away from lift access.

Policy links

- Policy S.SG2
- Policy D.H3
- Policy S. DH1

The transition from the door to the home, corridor, lift and lobby is an increasingly public space but these semi public/ private spaces can be unpleasant. These circulation spaces were universally identified as the spaces where residents first got to know their neighbours. Design should foster these interactions creating spaces that encourage a collective sense of belonging.

Entrances

Entrances should foster social integration between residents of different tenures and avoid visible subdivision.

Lifts and stairs

The intensity of use means lifts can become damaged easily. An additional lift with a more robust design would reduce wear and tear, particularly when moving furniture or living with pets.

Stair location and design encourages regular use

when moving short distances, improving health and reducing energy use.

Corridors

Wait times for a lift can be long at rush hour. To reduce frustration and support socialising between neighbours this space should be comfortable and attractive.

At high density corridors function as streets. A more generous design and differentiation across floors creates a more comfortable and pleasant living environment, improves navigation and creates a sense of belonging.

Doors

Staggering doors creates privacy at the threshold to the home whilst personalisation can create a more neighbourly feel that also supports orientation of the building particularly by children, those with dementia or autism.



The generous design through colour and large windows means the corridor functions as a street, supporting socialisation and play.

London Plan*Policy D6 Housing quality and standards*

3.6.6 Housing developments should be designed to maximise tenure integration, and affordable housing units should have the same external appearance as private housing. All entrances will need to be well integrated with the rest of the development and should be indistinguishable from each other.

GG1 Building strong and inclusive communities

Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:

C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation

London Housing SPG 2016

Standard 8 - All main entrances to houses, ground floor flats and communal entrance lobbies should be visible, clearly identifiable, and directly accessible from the public realm.

Standard 12 - Each core should be accessible to generally no more than eight units on each floor.

Standard 13 - An access core serving 4 or more dwellings should provide an access control system with entry phones in all dwellings linked to a main front door with electronic lock release. Unless a 24 hour concierge is provided, additional security measures including audio-visual verification to the access control system should be provided where any of the following apply: more than 25 dwellings are served by one core, or the potential occupancy of the dwellings served by one core exceeds 100 bed spaces, or more than 8 dwellings are provided per floor.

Standard 14 - Where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.

Standard 15 - All dwellings entered at the seventh

floor (eighth storey) and above should be served by at least two lifts.

Standard 16 - It is desirable that every wheelchair user dwelling is served by more than one lift.

Local Plan*Policy D.H3 Housing standards and quality*

2. Affordable housing should not be externally distinguishable in quality from private housing.

3. Developments must use hard wearing, durable materials for the affordable housing elements of the development.

Design guideline 46

The form and configuration of buildings should avoid the visible distinction between different housing tenures. If tenures are accessed by different entrances they should be tenure blind.

This means:

- equal prominence along the street
- the same scale of opening
- the same material palette including hard equitable quality of material treatment for landscaping, door specification and interior design and furniture.
- explore opportunities to provide shared entrances to access separate cores



Residents access the estate through a shared archway.

Mixed and balanced communities

66% of residents we spoke to felt their building lacked a community feel.

From interviews, there was a clear subdivision between affordable and private homes.

Policy links

- Policy S.SG2
- Policy D.H3
- Policy D.DH6
- Policy S.DH1

Design guideline 47

To support the creation of tenure blind communities, lobbies of both market and affordable homes should be of good quality finishes and spacious to allow for sufficient space for residents to wait and meet.

Further Consideration

All communal doors and gates should be easily automated.

Further Consideration

Entrance foyers should incorporate comfortable spaces to rest. The design and materials should be hardwearing and easy to clean, and seating may be built-in.



Tenure blind entrance is distinctive.

Mixed and balanced communities

From our research, residents of affordable developments were least likely to find their entrance lobby attractive and pleasant.

Interviews with residents demonstrated that the differences in lobby design and material specification made them feel aware of inequalities. Children particularly asked why this was the case.

Everyday life

Automated doors mean wheelchair users and the frail can move around the building with ease.

Buildings as systems

Similar interior finishes can provide economies of scale.

Policy links

- Policy S.SG2
- Policy D.H3
- Policy D.DH6
- Policy S.DH1

Design guideline 48

Locate stair cores directly adjacent to lift lobbies.

There should be clear visual connection through the location of doors, glazed elements and signage.

Further Consideration

Stair design and specification should be of a higher quality in areas of the building where they are used more frequently.

This includes the lowest four floors, to the basement and between communal areas.



Stairs at the lower floor are prominent to encourage use and activate the lobby.

● Everyday life

Only 13% of residents we spoke to use the stairs often, the proportion was still low for residents living below the fifth floor. 41% did not think the stairs were attractive and pleasant.

Ease of access and visibility might increase stair use for those travelling short distances, for example to communal amenity spaces.

From interviews, those using the stairs tended to do so when moving between four floors or less. Design can encourage activity by promoting stair use.

Policy links

- Policy D.H3
- Policy S.DH1

Design guideline 49

High density and tall buildings should have a minimum of two lifts. One of them should be particularly robust to accommodate transportation of waste and large items.



Lift is resistant to wear and tear and will be easy to be cleaned.

Everyday life

Moving in and out, refurbishing homes and the movement of pets and waste damages lifts. This was identified by both building managers and residents as a challenge in their everyday life and work.

Case studies revealed that managers line lifts when requested by residents, however regular damage and subsequent repairs resulted in lifts out of service causing frustration.

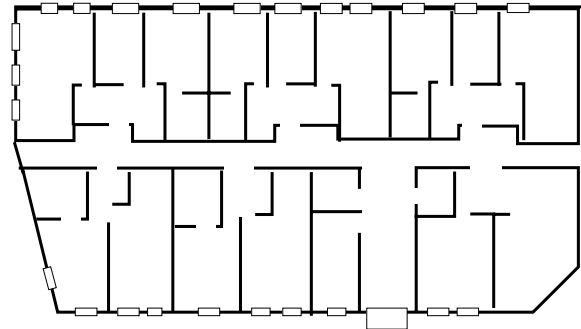
Policy links

- Policy D.H3
- Policy S.DH1

Design guideline 50

Building cores should generally serve no more than eight homes on each floor.

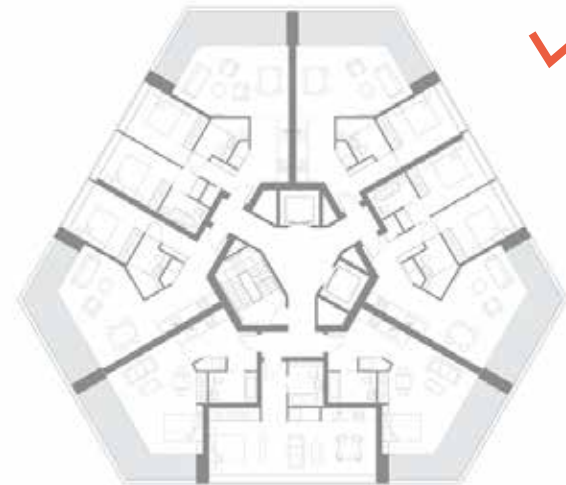
When cores are fifteen storeys, or 1,100 habitable rooms per hectare or more, consideration should be given to having cores serve less than eight homes.



A layout of six units per core allows for a short and straight corridor with three sources of natural light. It also reduces the number of single aspect homes.



Corridors are long and angled so there is no visibility from one end to another.



Can you please change the caption to: central core reduces circulation spaces to a minimum.

Mixed and balanced communities

At high density, residents are more likely to struggle to recognize and interact with neighbours. Fewer homes per core would encourage familiarity.

Healthy neighbourhood

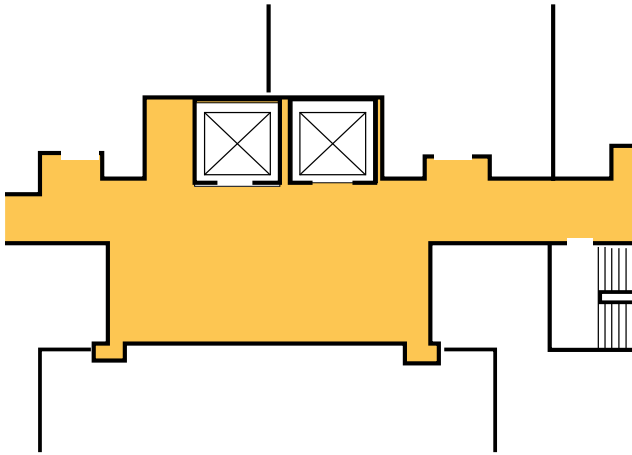
Reducing the number of homes per core assists in improving internal layouts, maximising the number of dual-aspect homes.

Policy links

- Policy D.H3
- Policy S.DH1

Design guideline 51

Space at the entrance to lifts on all floors should be generous to accommodate residents of the floor waiting for the lift.



The area immediately in front of lifts is spacious to comfortably accommodate residents waiting.

Mixed and balanced communities

Residents we spoke to report having to wait for lifts for some time and that at certain times of the day the number of people waiting is particularly high. The space in front of lifts should accommodate all residents on the floor. This is also an opportunity for them to interact.

Everyday life

Residents with special needs such as wheelchair users should have sufficient space to manoeuvre and wait.

Buildings as systems

31% of residents we spoke to did not think lifts were reliable.

At peak times, waits for the lifts in some case studies could be very long resulting in frustration.

Policy links

- Policy D.H3
- Policy S.DH1

Design guideline 52

Corridors should be generous and comfortable. To achieve this, they should be naturally ventilated and have access to natural light. Where possible, windows should be orientated over outdoor communal amenity space and play space.

If this cannot be achieved, corridors widths should be more generous (1500-2000mm).

Corridors should be considered as part of overheating assessments.



Corridors are generous and with good access to natural light.

Mixed and balanced communities

Corridors are the first spaces that neighbours come into contact with each other.

Well ventilated spaces with good noise insulation make these a more comfortable environment.

Healthy neighbourhoods

35% of residents we spoke to found overheating to be a concern. This was particularly prevalent in corridors, many of which lacked means of ventilation.

Everyday life

Residents with illness, such as multiple sclerosis, found communal heating systems to be hot. Particularly communal areas with no natural ventilation.

Policy links

- Policy D.H3
- Policy S.SG2
- Policy S.DH1

Design guideline 53

Corridors or lift lobbies should include spaces to sit. Any furniture should not compromise the wider safety of the building, through obstruction and/ or flammable materials, and be easy to clean.



Seating is distributed along the corridor.



Simple robust seating is found on each floor.

Mixed and balanced communities

18% of residents we spoke to did not think the space adjacent to the lift was attractive and pleasant. These tended to be sparse and vulnerable to overheating.

A comfortable environment encourages residents to linger, increasing opportunities for socialising.

Seating and other interior design features help create a sense of ownership and community across each floor.

Buildings as systems

Space to rest, wait and socialise provides assistance and a more comfortable living environment for those with mobility issues. This helps retain independence for longer.

Policy links

- Policy D.H3
- Policy S.SG2
- Policy S.DH1

Design guideline 54

There should be visibility in corridors to all residential entrances.



Entrances to the home are visible along corridors.

Mixed and balanced communities

Visibility, for example through straight corridors, improves sense of safety and reduces anxiety. Residents can see who is in the corridor.

Children and young people

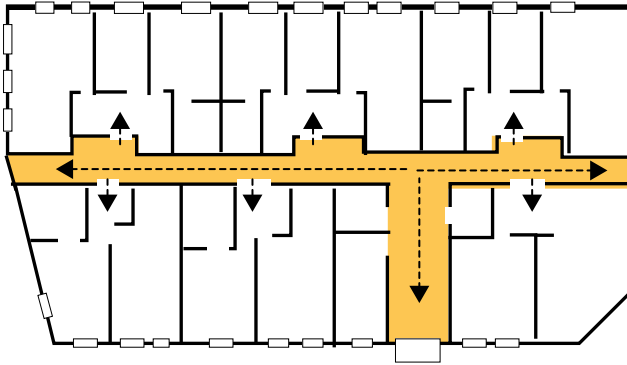
Visibility means children can occupy the corridor but still be seen by parents. This makes for more comfortable movement around the building but also supports the corridor as a space for doorstep play.

Policy links

- Policy D.H3
- Policy S.SG2
- Policy S.DH1

Design guideline 55

In buildings with double loaded corridors, residential doors should be staggered and recessed to define and create an interface between public and private space.



Residential doors are staggered along the corridor.



Door is staggered and colour provides personalisation and a sense of belonging.

Mixed and balanced communities

Staggered entrances increase privacy and minimise noise impacts.

Children and young people

Recessed spaces help mark the corridor as a space for doorstep play.

Everyday life

Recessed spaces create a buffer or transitional space between the private home and public corridor.

Policy links

- Policy D.H3
- Policy S.DH11

Further Consideration

Interior design, particularly the space immediate to lifts, should differ across floors. This could be achieved through different colour, print or features such as seating or plants.

Further Consideration

The finish of floors and walls should be durable and easy to clean, use colour and texture e.g. glazed brick.

Further Consideration

If indoor amenity space is distributed vertically throughout the building, the stair, lift lobbies and corridors connecting these spaces should support wayfinding with distinct finishes and incorporating clear signage.

Further Consideration

Lifts and signage should incorporate braille.

Further Consideration

Entrance to flats should be celebrated through the use of colour, lighting, and the ability to personalise.

Further Consideration

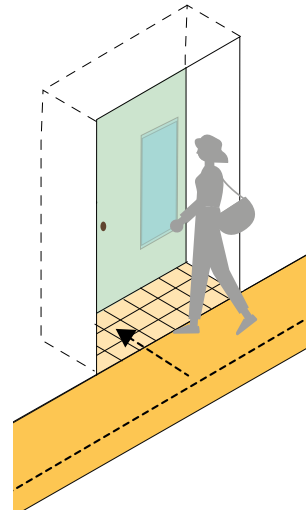
Doors leading to service facilities and staff rooms should be played down and blend with corridors.



Signage is clear, well-designed and robust.



Design of corridors are distinctive and vary across floors.



Residential entrances are distinctive along the corridor with personalisation through use of colour and glazing.

Mixed and balanced communities

Residents across schemes we surveyed describe living in the building as like living in a hotel. Internal spaces do not provide a sense of identity as all floors and doors look the same.

Personalisation impacts creates a sense of belonging and ownership.

Children and young people

Everyday life

Repetitive interiors across floors and between doors can cause disorientation and confusion, particularly for the young, the visually impaired, those with learning difficulties and dementia.

Distinctive entrances to the home or opportunities for personalisation can help residents find their way around.

Policy links

- Policy D.H3
- Policy S.DH11

Adapting and mitigating to the climate crisis and facilitating the transition to the circular economy requires a holistic approach to building systems, including waste, water and energy.

Mechanisms should support the borough's aims to be zero carbon and reduce consumption and waste.

Where processes require resident action, the design of routes and rooms can help or hinder the effective and regular use of building systems and services. It should be clear and convenient to participate in environmentally friendly behaviours.

Waste

Across case studies various methods of resident delivery of waste to waste rooms were seen. The pros and cons of each system are outlined in the appendix. In any case, methods should support the separation of waste, be easy for all residents and reduce demands on building management.

The document first outlines guidance of resident transportation of waste to disposal points. It then provides design guidance on waste collection methods. As outlined in the Local Plan, traditional waste collection methods will be resisted, with preference given to underground and vacuum waste systems.

Water

London has been declared by the Environment Agency as an area of serious water stress and this trend is likely to be exacerbated by climate change. Design and layouts should support water recycling methods.

Energy

Development requires the integration of renewable energy strategies. This should be integrated into design for greater effectiveness and reduce impact on resident amenity.



Rooftops incorporate solar energy and biodiversity.

London Plan

*Policy SI 2 Minimising greenhouse gas emissions
A Major development should be net zero-carbon.
This means reducing greenhouse gas emissions
in operation and minimising both annual and peak
energy demand*

*F Development proposals referable to the Mayor
should calculate whole life-cycle carbon emissions
through a nationally recognised Whole Life-Cycle
Carbon Assessment and demonstrate actions
taken to reduce life-cycle carbon emissions.*

Policy SL 5 Water Management

C Development proposals should:

*1) through the use of Planning Conditions
minimise the use of mains
water in line with the Optional Requirement of the
Building Regulations (residential development),
achieving mains water consumption of 105 litres
or less per head per day (excluding
allowance of up to five litres for external water
consumption)*

*3) incorporate measures such as smart metering,
water saving and recycling measures, including
retrofitting, to help to achieve lower water
consumption rates and to maximise future-
proofing.*

*Policy SI 7 Reducing waste and supporting the
circular economy*

*B Referable applications should promote circular
economy outcomes and aim to be net zero-waste.
A Circular Economy Statement should
be submitted, to demonstrate:*

- 1) how all materials arising from demolition and
remediation works
will be re-used and/or recycled*
- 2) how the proposal's design and construction will
reduce material
demands and enable building materials,
components and products
to be disassembled and re-used at the end of their
useful life*
- 3) opportunities for managing as much waste as
possible on site*
- 4) adequate and easily accessible storage space
and collection
systems to support recycling and re-use*

*5) how much waste the proposal is expected to
generate, and how
and where the waste will be managed in
accordance with the
waste hierarchy*

*6) how performance will be monitored and
reported.*

Local Plan

*Policy D.MW3: Waste collection facilities in new
development*

*1. All new development must include sufficient
accessible space to separate and store dry
recyclables, organics and residual waste for
collection, both within individual units and for the
building as a whole.*

*2. New major residential developments must
incorporate high quality on-site waste collection
systems that do not include traditional methods of
storage and collection.*

*10.37 – Such systems could include compactors,
underground storage containers, vacuum
systems and automated waste collection systems.
Preference should be given to systems that can
provide a weekly collection service as a minimum.*

Policy D.ES7: A zero carbon borough

*4.c seek to provide up to 20% reduction of carbon
dioxide emissions through on-site renewable
energy generation.*

*Policy D.ES6 Sustainable water and wastewater
management*

*1. Development is required to reduce water
consumption.*

*2. New development is required to minimise the
pressure on the combined sewer network.*

Design guideline 56

If waste chutes are proposed to transport waste from homes to a disposal point:

- chutes should be located within a specialised waste room at each floor.
- access should be clear and straightforward.
- doors should be automated so chutes can be accessed without putting waste down.
- there should be sufficient space around the chute to manouvre wheelchairs.
- materials should be robust and easy to clean.
- chutes should include the capacity to sort into three categories.

Further Consideration

All waste systems should incorporate robust signage (metal or hard plastic). Signage should be distinctive using icons, to be understood by all.

Further Consideration

Freehold/ leasehold and rental conditions should include clear obligations on the correct way to use waste management facilities.



An ineffective waste chute. It is not located in a special room, signage is unclear, the area lacks ventilation and the surrounding area would be easily damaged if waste was left on the floor.

● Children and young people

From interviews children often were tasked with taking waste to the chutes.

Chutes could be scary, particularly when they broke down and rooms fill up with waste.

● Buildings as systems

1/9 of case studies had waste chutes.

Although convenient for residents they resulted in some management issues. The mechanism for separating waste in the basement frequently broke down. Blocked chutes resulted in residents leaving waste in chute rooms on each floor creating smell and requiring additional maintenance.

Policy links

- Policy D.MW3

Design guideline 57

If waste is collected by staff and carried to a disposal point:

- corridors to be at least 1.5m wide so buggies and the 'collection vehicle' can pass with ease.
- collection vehicle to support collection of a minimum three categories.
- corridor materials should be robust and easy to clean.
- a management plan should outline collection times. These times should be varied to meet resident needs.
- there should be staff storage rooms with a sink on every five to eight floors.

**Buildings as systems**

1/9 case studies had flat collection.

This was very convenient for residents and good for separation of waste but was management intensive.

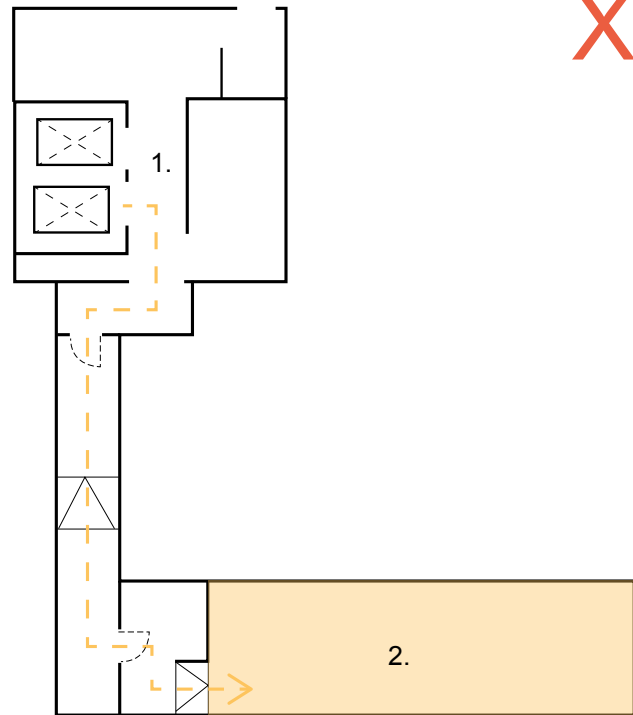
Policy links

- Policy D.MW3

Design guideline 58

If waste is transported by the resident from the home to the disposal point:

- disposal points should be close to lift cores, within five to ten meters.
- disposal points and access to disposal points should be well lit and well ventilated.
- materials should be robust and easy to clean.
- access should be clear and straightforward.
- disposal points should be well signposted.
- doors should be automated so rooms can be accessed without putting waste down.
- there should be sufficient space around the disposal point to manouvre wheelchairs.



Distance from core to refuse room long, convoluted

Buildings as systems

7/9 or 78% of case studies required residents to carry waste to basement rooms.

74% found this system convenient however convenience was worse for residents at the upper floors.

Resident delivery requires minimal management.

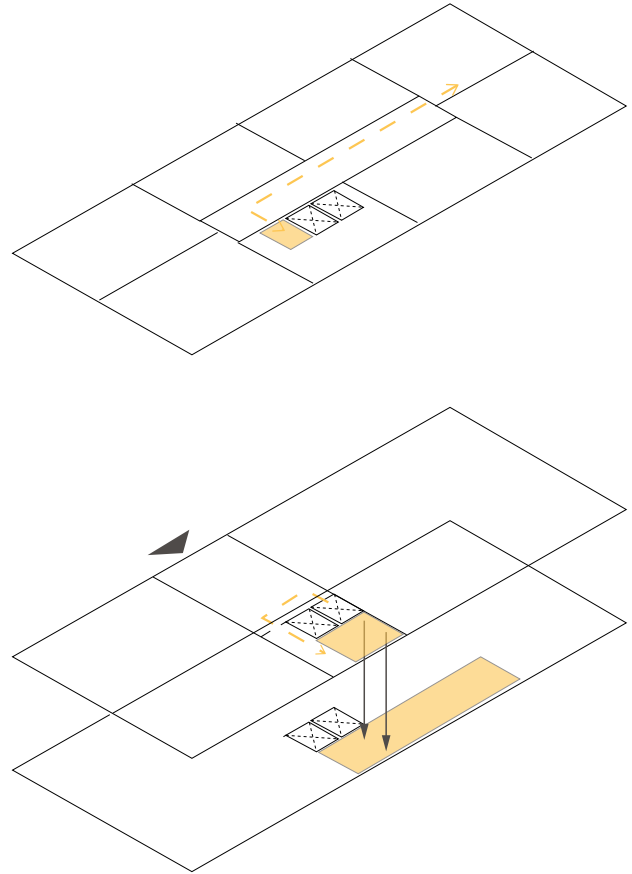
Policy links

- Policy D.MW3

Design guideline 59

If waste is transported by the resident from the home to a disposal point on each floor which is then transported by staff to central disposal point:

- disposal points and access to disposal points should be well lit and well ventilated.
- materials should be robust and easy to clean.
- access should be clear and straightforward.
- disposal points should be well signposted.
- doors should be automated so rooms can be accessed without putting waste down.
- there should be sufficient space around the disposal point to manoeuvre wheelchairs.



Model A. There is a waste disposal room on each floor. This is convenient for residents but requires more intense management.

Model B. There is a waste disposal room at the ground floor. This has better supervision than basement rooms and is easier to maintain than waste disposal rooms on each floor.

Buildings as systems

The hybrid model was not implemented in any case study.

The model maximises convenience for residents with less management than collection models.

The waste rooms can be combined with services for cleaners, such as a tap and storage.

Policy links

- Policy D.MW3

Design guideline 60

Traditional waste systems are not supported by the Local Plan and will be resisted. However, if following supporting evidence and confirmation by the Tower Hamlets Waste Team they are proposed layout should promote ease of management and separation of waste.

This can be achieved through:

- equidistant placement and prominence of each bin from the entrance.
- clear and robust signage on each bin.
- sufficient space to easily reorganise bins when some become full (outline bin circulation factors).
- be easy to reach by children and wheelchair users.



A traditional waste room with large Euro Bins. Bins are well located but difficult to open by wheelchair users and young children.

● Everyday life

● Buildings as systems

From interviews, 2/9 case studies did not separate waste. This caused frustration with some residents.

Interviews also found that for ease, residents would dump waste in the nearest bins. This reduced rates of separation, caused contamination and mess and restricted wheelchair access.

Traditional euro bins are very difficult to reach by wheelchair users and young children.

Policy links

- Policy D.MW3

Design guideline 61

Traditional waste systems are not supported by the Local Plan and will be resisted. However, if following supporting evidence and confirmation by the Tower Hamlets Waste Team they are proposed compactors are required.

These should be:

- linked to primary waste rooms.
- access limited to building management.
- compactors to support collection and sorting of a minimum of three waste streams.



Compactor example

Buildings as systems

From case studies, bins could become full particularly at the end of the weekend or public holiday.

Compaction would reduce the volume of waste and number of collection trips.

Policy links

- Policy D.MW3

Design guideline 62

A specialist room or area of the main waste room should be provided for the storage and collection of bulky goods and construction waste.

The bulky waste room should:

- be located in close proximity to communal refuse stores and lift cores.
- include a skip as required for construction waste (material from home refurbishment).
- the location and access should be well lit and well ventilated.
- materials should be robust and easy to clean.
- access should be clear and straightforward.
- refuse stores should be well signposted.
- doors should be hands free and push inward so rooms can be accessed without putting waste down.



Store has room for bulky waste and specialised items including lightbulbs and batteries.

Buildings as systems

Interviews highlighted that bulky waste caused bins to fill up, resulting in mess and additional collection trips.

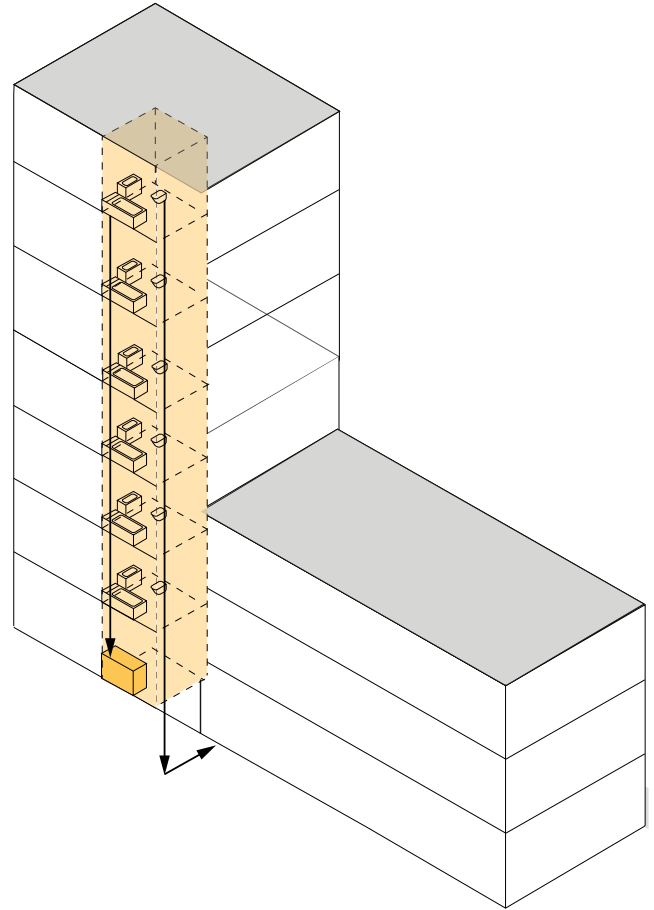
A specialised room would avoid disruption to standard residential waste collection.

Policy links

- Policy D.MW3

Design guideline 63

Install greywater reuse strategies to reduce water consumption. To support this, toilet should be stacked as much as possible with an extra riser and tank room.



Toilets are stacked and there is sufficient space in basements/ plant rooms for the circulation of greywater.

Buildings as systems

No case studies included water saving mechanisms such as greywater reuse.

Reuse reduces water consumption and pressure on local sewer systems.

Stacking increases efficiency and allows for potential retrofit in the future.

Policy links

- Policy D.ES6

Design guideline 64

Air source heat pumps

Design Considerations:

- locate on upper roofs that are not overlooked, particularly those less suitable for communal amenity space.
- set aside 15sqm as a minimum plus space for access and energy storage if required.
- acoustic insulation.
- heat insulation.

Further Consideration

Ground source heat pumps

Design Considerations:

- suitable for larger masterplans or the retrofit of existing areas.
- a sufficient space at the ground floor or in the public realm required for the regular distribution of boreholes approximately 200m deep.
- space should be allocated for a central plant room within the building or small heat pumps within each dwelling.



Air source heat pumps can be located on the topmost rooftops.

● Buildings as systems

● Healthy neighbourhood

Beyond roof top solar thermal or solar PV panels on roof tops, case studies do not incorporate significant renewable energy generation.

Air source heat pumps are a cost effective zero carbon source of heating.

Ground source heat pumps are a cost effective zero carbon source of heating when implemented at the neighbourhood scale.

Policy links

- Policy D.ES7

Design guideline 65

Solar - PV and/ or Solar thermal

Design Considerations:

- locate on upper roofs that are not overlooked, particularly those less suitable for communal amenity space.
- integrate panels on south facing elevations at the upper floors
- integrate panels into the design of the facade and roof treatment.
- combine with a biodiverse roof for more efficient and attractive space.

Further Consideration

Hydrogen fuel cell

Design Considerations:

- Scope to replace CHP facilities in basement plant rooms



Solar panels are integrated into the design of the building, located on the roof and the cladding of the top floors.

● Buildings as systems

● Healthy neighbourhood

Solar thermal and photovoltaic panels are the most straightforward renewable energy source to integrate into high density development.

Hydrogen fuel cells can be an effective source of zero carbon energy but use is currently limited in residential developments.

Policy links

- Policy D.ES7

Active travel, including walking and cycling, improves health, lowers emissions, reduces congestion and promotes social integration.

Cycle stores

Existing policy on residential buildings promotes cycling through the provision of cycle parking spaces. From the study of case studies this can result in very large basement storage rooms that are underoccupied. This is part due to safety and convenience.

Bike stores distributed around the building and in more convenient and prominent locations would support different types of cycling and make it more of a regular part of everyday life.



Cycle stores in areas of regular use to improve perceived sense of safety.

London Plan*Policy D3 Optimising site capacity through the design-led approach*

2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area

Policy T5 Cycling

A Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:

- 1) supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure
- 2) securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.

B Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

London Housing SPG 2016

Standard 20 (Policy 6.9)- All developments should provide dedicated storage space for cycles at the following level:
1 per studio and one bed
2 per all other dwellings.

In addition, one short stay cycle parking space should be provided per 40 units.

Standard 21 - Individual or communal cycle storage outside the home should be secure, sheltered and adequately lit, with convenient access to the street. Where cycle storage is provided within the home, it should be in addition to the minimum GIA and minimum storage and circulation space requirements. Cycle storage identified in habitable rooms or on balconies will not be considered acceptable

Local Plan*Policy S.TR1 Sustainable travel*

1. Travel choice (including connectivity and affordability) and sustainable travel will be improved within the borough and to other parts of London, and beyond. Development will therefore be expected to:
 - a. prioritise the needs of pedestrians and cyclists as well as access to public transport, including river transport, before vehicular modes of transport

Policy D.TR3 Parking and permit-free

3. Development is required to prioritise sustainable approaches to any parking through ensuring:
 - a. Priority is given to space for cycle parking

Design guideline 66

To increase cycle uptake by offering greater flexibility for residents, minimum cycle storage requirements should be provided in different locations.

This could include a mix of:

- cycle storage at home.
- cycle storage at street level.
- cycle storage in courtyards.
- cycle storage in basement rooms.
- bike hangars in the public realm.

Further Consideration

Cycle storage should be actively managed with spaces in more prominent locations retained for those that use their cycles most often.



Cycle stores at the street level.

Everyday life

Buildings as systems

15% of those surveyed had bikes. Of these, 26% stored their bike in the home and 70% in the designated bike store.

Some bike stores were difficult to access, requiring residents to pass through more than two doors or to leave and re-enter the building.

Street level stores are most convenient. Bike hangars offer greatest security.

Policy links

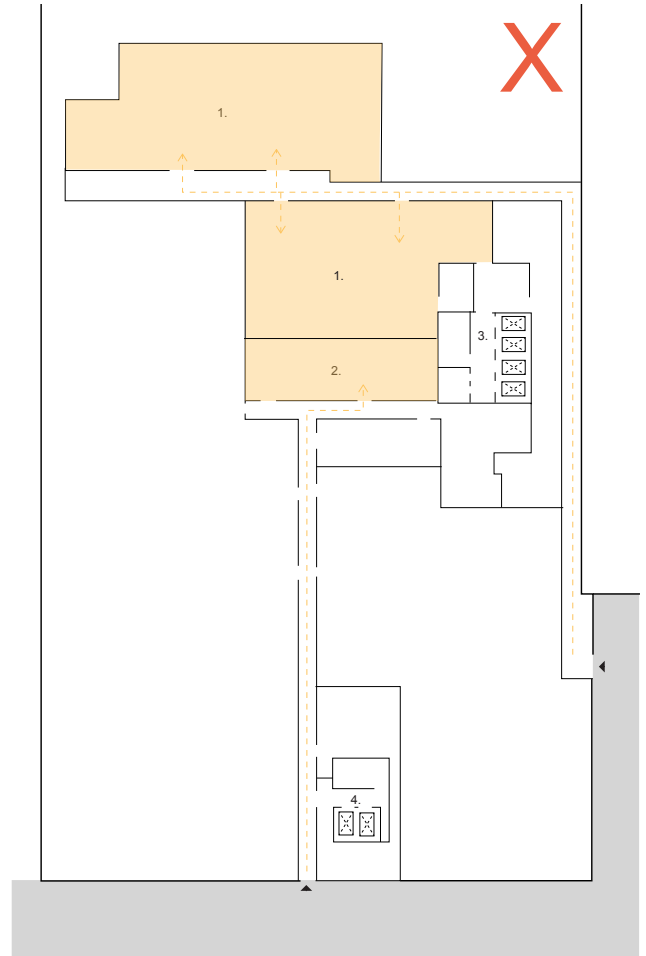
- Policy S.TR1

Design guideline 67

If cycle storage is provided in the basement, access should be quick, straightforward and step-free via a ramp or direct lift. Access should avoid staircases and more than two doors.



A separate lift is provided directly down into cycle stores.



Routes into cycle stores from the public realm are very convoluted and stores are hidden from other uses.

● Everyday life

● Buildings as systems

23% found cycle stores difficult to access.

These tended to be in basements and away from the main entrance or lift access to homes.

Policy links

- Policy S.TR1

Design guideline 68

Cycle storage should be co-located with clear visual connection to more active spaces such as the street, lobby or adjacent well used space.



Cycle stores have visibility from the street and other spaces in the basement.

● Everyday life

● Buildings as systems

24% found cycle stores to be unsafe.

Stores were often in basements, out of site and away from areas of regular footfall.

Policy links

- Policy S.TR1

Further Consideration

Provide space for cycle repair and washing at the ground floor or within cycle stores. Spaces should include a sink, low level tap and drainage.



Bike repair room is attractive, well lit and includes a sink.

● Everyday life

● Buildings as systems

Interviews with residents that cycled regularly found that cycle stores were locations where they got to know their neighbours.

Facilities in a cycle store support good quality of life by making maintenance and repair more convenient. It also extends the role of the store as a place where people linger.

Policy links

• Policy S.TR1

High Density Developments, particularly Tall Buildings, require more extensive management and are harder to maintain. This is in part due to the large population and their various needs.

Residents interviewed felt positive towards building management and service charges if post and security were managed efficiently and there was a quick response to repairs.

Staff and Contractors

Regular upkeep of a high density building requires full time staff. In addition, repair work and refurbishing of homes involves additional contractors. Their duties have spatial requirements, such as access to water points on each floor, places to store equipment and places to rest.

Deliveries

The trend for home deliveries is set to continue. Specialist post rooms provide an efficient service for residents and reduce pressure on the concierge.



Staff room incorporates many uses of the space, including storage and rest but is undersized.

London Plan

D3 Optimising site capacity through the design-led approach

4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

3.3.17 New developments should be designed and managed so that deliveries can be received outside of peak hours and if necessary in the evening or night-time without causing unacceptable nuisance to residents.

Appropriate facilities will be required to minimise additional freight trips arising from missed deliveries.

Policy D4 Delivering Good Design

Higher density residential developments should demonstrate their ongoing sustainability in terms of servicing, maintenance and management. Specifically, details should be provided of day-to-day servicing and deliveries, longer-term maintenance implications and the long-term affordability of running costs and service charges (by different types of occupiers).

Table 3.2 Qualitative design aspects to be addressed in housing developments

Usability and ongoing maintenance

- sufficient levels of secure, covered and conveniently located externally accessible storage is provided for deliveries and other bulky items

Local Plan

Policy D.TR4 Sustainable delivery and servicing

1. Development that generates a significant number of vehicle trips for goods or materials during its construction and/or operational phases is required to demonstrate how:

b. delivery of goods and servicing will be provided within the site to encourage shared arrangements and timing of deliveries, unless demonstrated it can take place on-street without affecting highway safety or traffic flow.

d. deliveries to sites will be reduced through suitable accommodation and management.


Design guideline 69

Building management requirements should be considered early on in the planning process. This should include staff facilities and their requirements.

If required staff rooms should be:

- generous and well laid out with space for tables and chairs.
- well ventilated and well lit.
- include toilets and a shower
- include storage lockers for personal items.
- include worktops with space provided for equipment including a sink, kettle, fridge and microwave.

Consider requirements for contractors whose activities might be at odds with permanent staff.

 Buildings as systems

If space was provided for permanent staff this was usually in the basement with no windows or ventilation and away from areas where their passive surveillance would be beneficial.

Policy links

- Policy D.H3
- Policy D.DH6

Design guideline 70

Building management requirements should be considered early on in the planning process including facilities required for cleaning and maintenance.

This should include:

- a primary store located in the basement,
- adjacent to the lift core.
- a smaller storage space located in residential corridors at every five to eight storeys.
- shelving and a tap.
- if flat collection is the proposed waste collection method, storage should include space for the trolley/ vehicle.



Small facilities for maintenance and cleaning in a corridor

Buildings as systems

From case studies, staff would frequently need to travel to the basement and back to access items. This was an inefficient use of their time.

There was a lack of provision of space for hazardous cleaning products.

Policy links

- Policy D.H3
- Policy D.DH6

Design guideline 71

Presence of building management should be maximised to create sense of belonging, improve efficiency of day to day management and maintenance and reduce ASB. Building management requirements can have service charges implications. Design through location of spaces and facilities can support these benefits without putting strain on affordable tenures.

This could take the form of:

- Concierge desk within building lobbies oriented to have ease of access to communal spaces.
- Concierge/building management facilities with clear visibility to multiple entrances.
- Care taker/building management facilities close to communal spaces and/or entrances.
- In larger sites with multiple buildings one central contact point with a concierge.



The concierge desk is prominent, with views into communal amenity space.

● Mixed and balanced communities

The concierge played a key role in the sense of community in the building by creating familiarity.

There was greater satisfaction and efficiency when both affordable and private elements of the building were managed by one company/ provider.

● Everyday life

● Buildings as systems

From interviews, the regular presence of a concierge or building manager made residents feel more secure and satisfied with the building.

The presence of staff increased passive surveillance and safety.

Policy links

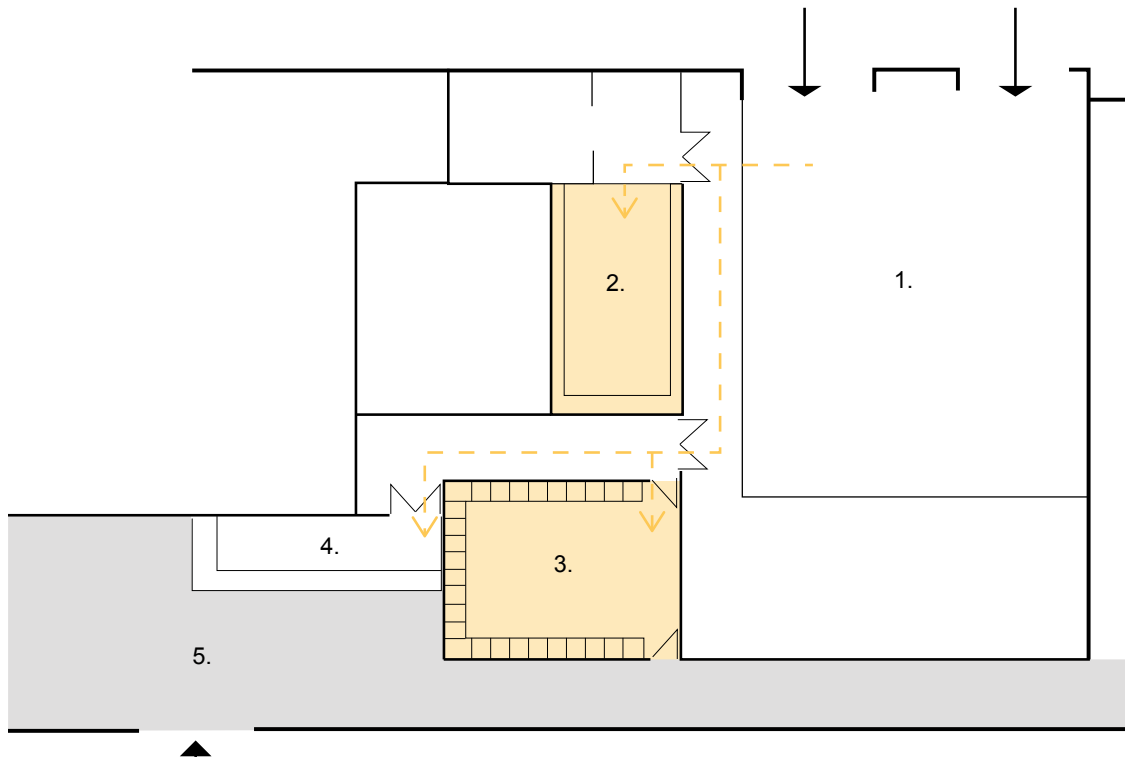
- Policy D.H3
- Policy D.DH6

Design guideline 72

If the scheme is a larger masterplan, provide a dedicated room for collecting, storing and returning deliveries. This should be located on a main street and near to the concierge.

Further Consideration

Consider the virtual consolidation of deliveries to reduce the number of trips.



The delivery bay and delivery room are in close proximity and close to the concierge for ease of management.

● Everyday life

● Buildings as systems

A consolidated location for deliveries can provide greater efficiency, reducing the number of trips.

Policy links

• Policy D.TR4

Design guideline 73

If the scheme is a single building, post boxes for each dwelling for letters and small non valuable items should be provided securely in the lobby or doors to the home.

An additional secure post room should be managed by the concierge for larger parcels and items to be signed for.



Postboxes activate the lobby and are integrated into the design of the space. More secure options include post boxes in a room off the lobby with fob access.

● Everyday life

● Buildings as systems

When available, residents found the collection of parcels to be a significant benefit of living in contemporary high density buildings.

Policy links

- Policy D.TR4

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3. Home

3.1 Internal layouts

Entrance
Living, kitchen and dining
Bathrooms
Bedrooms

3.2 Private amenity space

Orientation
Type

3.3 Adaptability

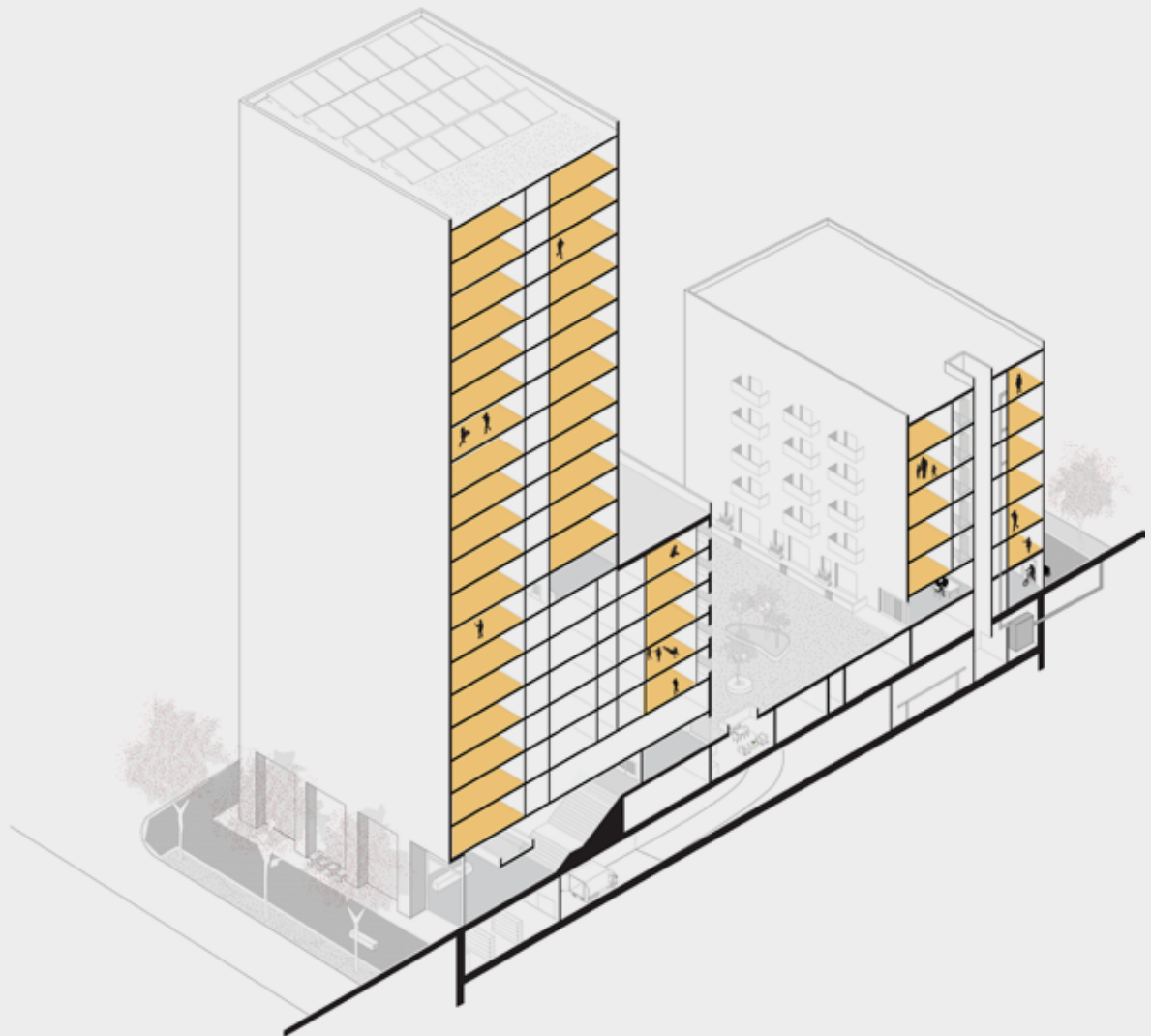
Layout
Laundry
Storage

3.4 Construction and materials

Zero carbon and the circular economy

3.5 Environment

Existing standards
Flat layouts
Mitigation
Noise
Overlooking and privacy



The home should be a space of rest and retreat. It should be comfortable, support the ease of daily activities and chores and be able to adapt to changing needs.

Children and young people

Families occupy a range of dwelling sizes, not just larger three bed homes. All layouts should be designed for future flexibility and consider the use, movement patterns and needs of residents of all ages.

The layout of the unit should be able to respond to the changing special needs of a family, so they can invest in the home for the long term.

Mixed and balanced communities

The design of outdoor and communal space in high density development should help to foster the social integration of residents through regular interaction and opportunities for socialising. To support this, the home should be a space of retreat, rest and privacy.

Everyday life

High density and tall buildings can be a desirable living environment for all types of people. To create places where people can call home and live long term there should be the capacity to adapt the home and sufficient storage.

Consideration of domestic tasks and home working in the design of layouts can make life easier for residents and reduce conflict between different uses of the home.

Buildings as systems

The design of the home should support environmentally friendly behaviours and the transition to the circular economy. This includes flexibility and initial fit out with furnishings and goods that are made from reusable and recyclable materials, and that are easy to maintain and repair. In addition, there should be sufficient space to sort and store waste into a minimum of three streams in accordance with the waste strategy for the wider building.

Healthy neighbourhoods

The home is where people spend the majority of their time, accordingly it should optimise environmental conditions to promote occupant's health and well-being. Buildings should achieve excellent levels of daylight and sunlight internally, mitigate the risk of overheating, be energy efficient and achieve good views out and good levels of privacy. This requires a holistic approach that effectively balances the sometimes contradictory parameters.

Whilst minimum space standards for homes are prescribed nationally how this is met and rooms and uses organised has significant impact on liveability. Creating flexible and adaptable layouts creates homes where people live long term, supporting the creation of stable communities. COVID -19 has brought this to greater attention where limited space and overcrowding means rooms must serve a multitude of functions.

Entrances

Entrances function as the transitional space between private home and shared corridor.

With the corridor functioning as a street, acoustic and visual privacy require consideration.

They are also a functional spaces where people get ready to go out or unload items that might be large, required daily or messy.

Kitchen and living rooms

Kitchens and living spaces are the social hub where families or sharers gather.

due to local need and preference, family homes in affordable development should have separate kitchens and living rooms.

There should be sufficient storage space to make waste separation easy without excessive clutter in the home.

Bathrooms

The volume of people in high density environments places further pressure on the water network. Tall buildings generate challenges over water pressure. Steps to improve efficient water use is therefore essential to mitigate the impacts of high density and tall buildings.

Bedrooms

With COVID-19 and the rise of flat sharers, the bedroom is typically a multifunctional space where a resident can spend a great deal of time. Particularly in the common instance where living rooms are converted into an additional bedroom.



A spacious entrance, larger items such as a buggy do not obstruct movement.

London Plan

Policy GG1 Building strong and inclusive communities

E ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.

F support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.

Policy D4 Housing quality and standards

Policy D6 Housing quality and standards

A Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

B Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.

E Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.

F Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Local Plan

Policy S.H1 Meeting Housing Needs

3. All housing must be well-designed, sustainable and take appropriate account of cumulative development. Developments are strongly encouraged to demonstrate this through meeting the Home Quality Mark standard.

4. Development will be supported which seeks to meet the needs of specific communities, including:

- a. Older people*
- b. Disabled and vulnerable people*
- c. Students*
- d. Gypsies and travellers*

Policy D.H3 Housing standards and quality

1. Development is required to demonstrate that, as a minimum, it meets with the most up-to-date London Plan space and accessibility standards, in particular:

- a. it provides a minimum of 2.5 metres floor-to-ceiling heights, and*
- b. at least 10% of dwellings are built to the 'wheelchair user dwellings' accessible housing standard M4 (3) and the remainder of dwellings are built to the 'accessible and adaptable dwellings' accessible housing standard M4 (2) both contained within part M (volume 1) of the building regulations.*

Building Regulations- Accessible and Adaptable Dwellings

2.20 The principal private entrance, or the alternative private entrance where step-free access cannot be achieved to the principal private entrance, should comply with all of the following:

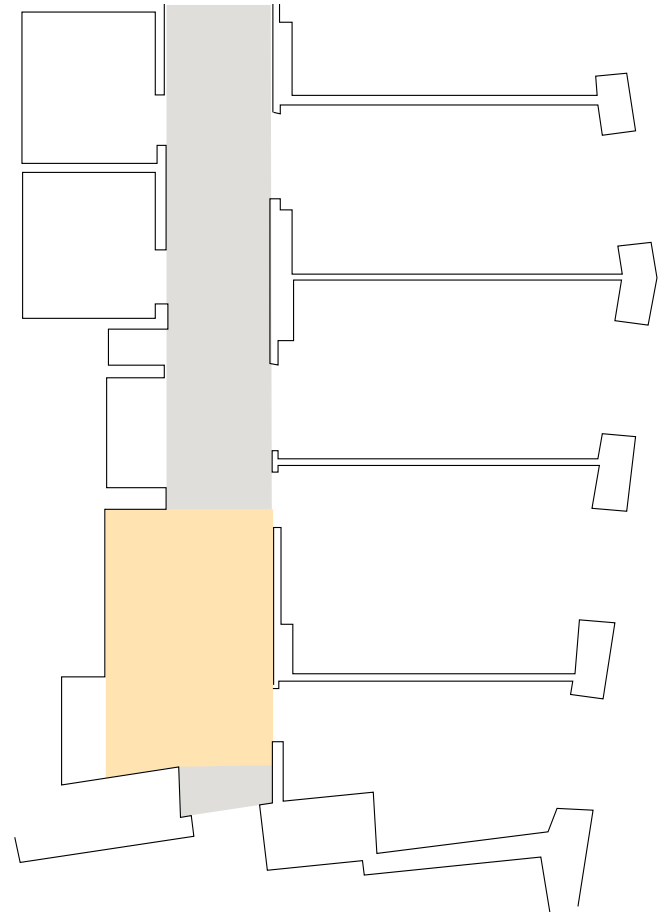
- a. There is a level external landing with a minimum width and depth of 1200mm.*
- b. The landing is covered for a minimum width of 900mm and a minimum depth of 600mm.*
- c. Lighting is provided which uses fully diffused luminaires activated automatically by a dusk to dawn timer or by detecting motion.*
- d. The door has a minimum clear opening width of 850mm.*
- e. Where there are double doors, the main (or leading) leaf provides the minimum clear opening width.*
- f. A minimum 300mm nib is provided to the leading edge of the door and the extra width created by this nib is maintained for a minimum distance of 1200mm beyond it.*
- g. The depth of the reveal on the leading side of the door (usually the inside) is a maximum of 200mm.*
- h. The threshold is an accessible threshold.*
- i. Where there is a lobby or porch, the doors are a minimum of 1500mm apart and there is at least 1500mm between door swings.*

Design guideline 74


Entrances to the home should be spacious, proportional to the home size.

The entrance space should not be obstructed by the inward swing of the front door or any internal doors.

The entrance area should provide a dedicated storage space for items like coats and shoes.




Flat layout provides a generous entrance lobby which allows for people to dress and undress from outdoor wear and reduce significantly the extent of the internal corridor.

 Mixed and balanced communities

 Everyday life

A spacious entrance creates a welcoming space where transition from outdoors to indoors attire can be done, guests can be greeted and deliveries can be received.

 Children and young people

 Everyday life

Storage for items of everyday use adjacent to the entrance reduces clutter and congestion in the home. This is particularly important for those regularly using large items such as wheelchairs, a buggy or mobility scooters.

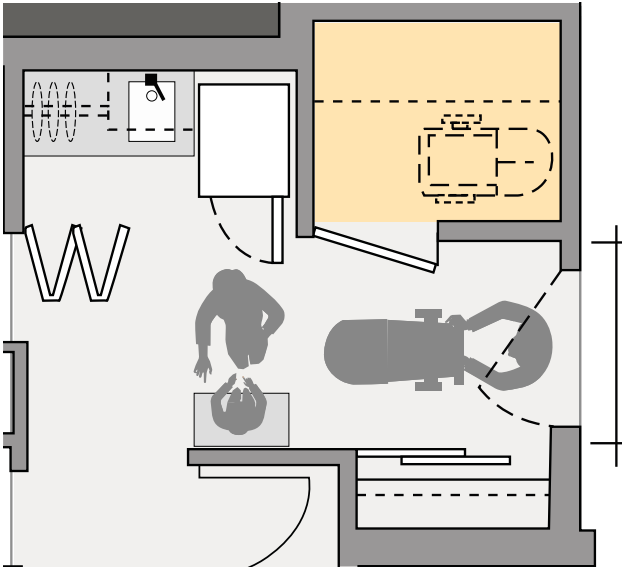
From interviews, trying to accommodate these in existing cupboards takes up all the space so they are commonly kept in the corridor. This conflicts with other uses and causes fire risk,

 Everyday life

Lack of storage space results in clutter and awkward layouts can restrict movement. This is exacerbated for the elderly or less mobile.

Policy links

- Policy S.H1
- Policy D.H3



Storage space is provided immediately adjacent to the entrance.



Design guideline 75

The design of kitchens and living spaces should be flexible to allow rooms to be separated or open plan.

Ideally open plan living/kitchen/dinning should be dual aspect. There should be windows to both spaces.

If a wall separates kitchens and living rooms, this should be non-structural to allow for removal or refurbishing with sliding doors as required.

If kitchens and living spaces are separate, layout and design should ensure visibility and ease of access between each room.



Opportunities to open or divide rooms easily

● Children and young people

Separate kitchens and living rooms are a cultural preference for many of Tower Hamlets' residents.

When living rooms are visually connected to kitchens, caregivers can supervise children at play.

● Everyday life

Flexibility means homes can be adapted to residents needs as they change over time.

Visibility supports connection and socialisation between occupiers of each room.

Policy links

• Policy S.H1

• Policy D.H3

Design guideline 76

Dwellings should provide built in storage space within or adjacent to kitchens for a minimum of three containers to separate waste. Separation should include:

- Mixed dry recycling
- Food waste
- Residual waste



Waste stored within cabinets

● Everyday life

● Buildings as systems

48% of residents we spoke to did not feel they had sufficient space to keep different kinds of waste. From interviews when waste was separated it usually had to be kept in containers on the kitchen floor. This was particularly disruptive for studios and smaller flats.

Sufficient storage space would improve rates of recycling and reduce residual waste.

Storage would also reduce clutter within residential dwellings.

Policy links

- Policy S.H1
- Policy D.H3
- Policy D.MW3

Design guideline 77

Install efficient water fittings and plumbing. This should include:


- low and dual flush toilets;
- low flow taps and shower heads;
- low water consuming washing machines and dishwashers

Further Consideration

Bathroom finishes, fixtures and fittings should be easy to adapt to personalise and meet changing needs as a result of health and ageing.

 **Everyday life**

From some interviews, high specification of some bathrooms caused difficulties with maintenance. Residents were not allowed to adapt their homes as consistency was desired across the whole building.

 **Buildings as systems**

Water efficient fixtures and fittings reduce consumption and pressure on the water network.

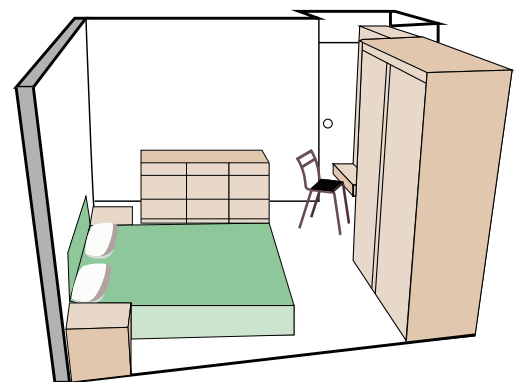
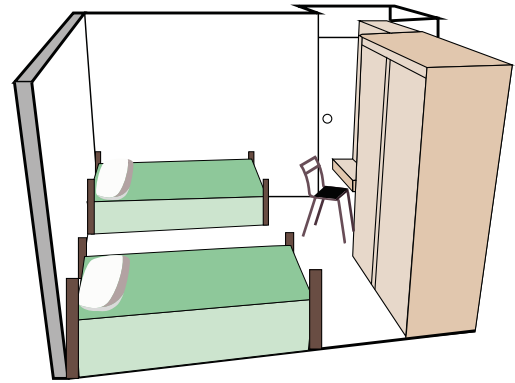
Policy links

- Policy S.H1
- Policy D.H3
- Policy DES6

Design guideline 78

Two bedroom four person homes should be maximised where possible as they provide greater flexibility.

In two bedroom three person homes, second bedrooms should be oversized if they are a non standard layout (rooms that are not rectangular or square).



Different bedroom layouts.



Children and young people

Families in private developments occupied a range of home sizes, not just 3 bedroom and above. 39% of families did not live in family homes. 17% of families with up to two children lived in studios and one bedroom homes.

From case studies it is evident that two and three bed homes typically have one master bedroom, second and third bedrooms are typically smaller. This, and non standard layouts, restricted flexibility. On some occasions residents stated they would need to leave as their family grew.



Everyday life

20% of residents we spoke to shared their home with adults who were not related to them and 14% were students.

With the rise of home-working and the number of students living in these buildings bedrooms become places of work and socialising as well as rest. Adequate storage and spacious layouts are therefore key for comfortable environments for those spending more time in their room.

Policy links

- Policy S.H1
- Policy D.H3

Outdoor private amenity space is beneficial for well-being. It can contribute to a sense of space and openness in the home and can provide opportunity for relaxation and leisure.

Orientation

Orientation refers to the position of private amenity spaces in relation to its surrounding context. Orientation can influence the quality of an amenity space in terms of; access to daylight, sunlight and outlook, and the impacts from noise and air quality. Orientation also determines the relationship of private amenity spaces to other outdoor spaces, influencing the degree to which they contribute to the passive surveillance or compromise privacy.

Type

Private amenity space can take many forms, from a ground floor garden, a roof top terrace or a balcony. These follow building typology but have significant impacts on the quality and usability of the space.



Inset balcony incorporates space for planting.

London Plan*Policy D6 Housing quality and standards**Private outside space*

9) A Where there are no higher local standards in the borough development plan documents, a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1.

Table 3.2 Qualitative design aspects to be addressed in housing developments

v Private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation.

London Housing SPG 2016

Standard 26 - A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.

Standard 27 - The minimum depth and width for all balconies and other private external spaces should be 1500mm.

Local Plan*Policy D.H3 Housing standards and quality*

5. Development will need to demonstrate how they will meet the following minimum amenity space (private, communal and child play space) standards on site:

a. a minimum of five square metres of private outdoor space should be provided for 1-2 person dwellings and an extra one square metres should be provided for each additional occupant.

b. balconies and other private external spaces should have a minimum width and depth of 1500 mm.

9.48 In considering the design and layout of private amenity space, it is important that the space meets the minimum standards set out in the policy (see Part 5) to ensure that residents have sufficient space to carry out activities such as drying clothes or eating a meal outside. In relevant areas, developments should also be guided by Policies D.ES2 (Air quality) and D.ES9 (Noise and vibration) in relation to the layout and design of amenity space.

Policy D.DH2 Attractive streets, spaces and public realm

2. Development is also required to positively contribute to the public realm through:
e. ensuring balconies do not over-hang on the public highway or onto neighbouring properties, civic spaces and public buildings, such as schools.

Design guideline 79

Outlook and orientation of private amenity space should avoid facing out onto areas of poor air quality and unacceptable noise.

If this cannot be avoided, private amenity space should be provided in the form of an inset balcony or winter garden.



Wintergardens offer good protection.

● Everyday life

● Buildings as systems

● Healthy neighbourhood

Private amenity space is intended to improve the quality of residents lives. High noise levels and air quality counter these aims by creating stress and detrimental health impacts.

From interviews, some residents expressed preference for a winter garden when their home faced a main road.

From interviews, private amenity space provided essential ventilation and cooling in the summer months. When the building was near a noise source this disrupted the sleep of some residents causing stress and discomfort.

Policy links

- Policy S.H1
- Policy D.DH8
- Policy D.H3
- Policy D.ES2

Design guideline 80

Ideally, family homes should be located on the lower floors with private amenity space in the form of a terrace or garden. If private amenity space for family homes at upper levels are only in the form of balconies, these should feature improved safety and security measures such as higher balustrades.



Generous inset balcony.

Children and young people

Outdoor play is essential for childhood development. Balconies, particularly those at the upper floor can feel unsafe for children. More considered design supports balconies as places for play.

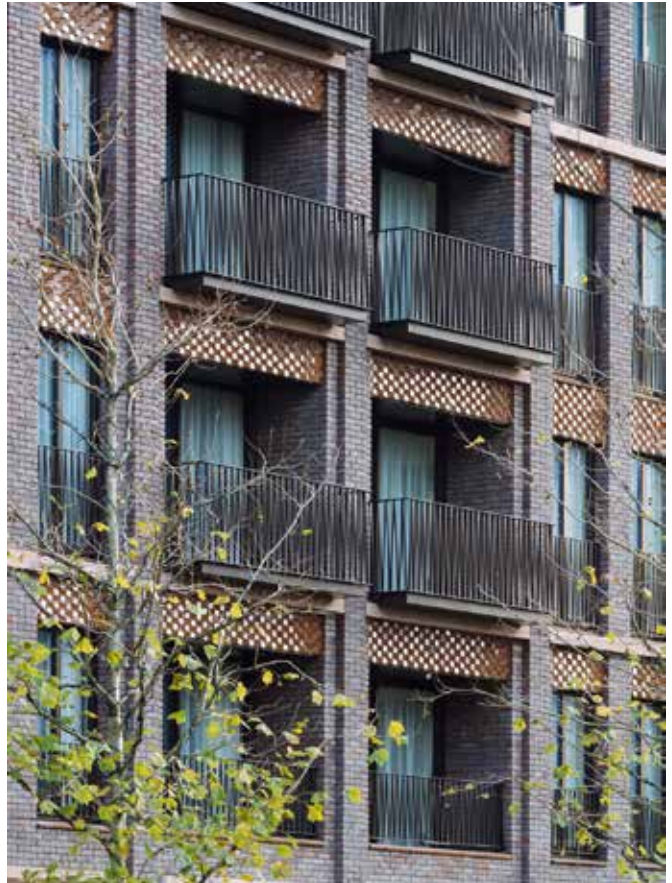
Policy links

- Policy S.H1
- Policy D.H3

Design guideline 81

Where a wind assessment is required this should assess balcony design. Depending on findings design strategies include:

- Solid balustrades
- Semi-recessed balconies
- Inset balconies
- Winter gardens



Semi-recessed balconies with distinctive balustrades.

● Everyday life

● Buildings as systems

● Healthy neighbourhood

29% of the residents we spoke to did not feel their private amenity space was protected from wind.

From interviews, some residents could not keep outdoor furniture and struggled to keep windows and doors open during windier periods.

Policy links

- Policy S.H1
- Policy D.DH8
- Policy D.H3
- Policy D.DH6

Design guideline 82

If winter gardens are provided they should:

- majority glazing to walls.
- be openable up to at least 30% of the wall area.
- not contain radiators/ heating.
- provide effective enclosure from wind, noise and pollution.



The environment of the winter garden is easy to control by opening or closing large windows and doors.

- Everyday life
- Buildings as systems
- Healthy neighbourhood

Private amenity space is intended to improve the quality of residents lives. High noise levels and air quality counter these aims by creating stress and detrimental health impacts.

From interviews, some residents expressed preference for a winter garden when their home faced a main road.

Policy links

- Policy S.H1
- Policy D.DH8
- Policy D.H3
- Policy D.ES2

Design guideline 83

Private amenity space should be positively drained.

Everyday life

When balcony floors are slatted, it is difficult to water plants, conduct dirty activities or clean without impacting residents below. Activities that can be conducted in the outside space are limited.

Mixed and balanced communities

Poor drainage can cause conflict between residents of different floors.

Policy links

- Policy S.H1
- Policy D.DH8
- Policy D.H3
- Policy D.DH6

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Building regulations require homes to feature a degree of accessibility and adaptability, so that they can be changed to respond to occupants requirements. However, these statutory requirements only go so far, and further design consideration should be addressed to create a truly flexible and long-term home. If people are able to remain living in their homes and neighbourhoods for a long time, there are greater opportunities to create a strong community.

Layout

Rational configurations of rooms enable residents to add or remove walls so the home can adapt if needs change.

Spacious, regular shaped home layouts allows residents to accommodate different furniture configurations.

Laundry

Small homes can make domestic chores a challenge and can make it difficult to enjoy the home. A separate laundry cupboard frees up space and maintains the living space as one for rest and relaxation.

Storage

Excessive clutter due to lack of storage can be detrimental to well-being and resident enjoyment of the home. Storage can be a particular challenge for flat sharers, families and those with certain illnesses.



Spacious living spaces with regular internal layouts mean furniture can be accommodated in different ways.

London Plan

Policy GG1 Building strong and inclusive communities

Policy D6 Housing quality and standards

5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sqm within the Gross Internal Area).

6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.

7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sqm in a double bedroom and 0.36 sqm in a single bedroom counts towards the built-in storage requirement.

Policy D7 Accessible housing

London Housing SPG 2016

Standard 24 All new dwellings should meet the nationally described space standard.

Standard 25- Dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy and the furniture schedule set out in Approved Document Part M.

Local Plan

Policy D.H3 Housing standards and quality


1. Development is required to demonstrate that, as a minimum, it meets with the most up-to-date London Plan space and accessibility standards, in particular:

- a. it provides a minimum of 2.5 metres floor-to-ceiling heights, and
- b. at least 10% of dwellings are built to the 'wheelchair user dwellings' accessible housing standard M4 (3) and the remainder of dwellings are built to the 'accessible and adaptable dwellings' accessible housing standard M4 (2) both contained within part M (volume 1) of the building regulations

Design guideline 84

Kitchens and bathrooms should be stacked across floors as much as possible.

 Everyday life

 Buildings as systems

Stacking kitchens and bathrooms increases efficiency, minimises disruption when repairs are required and reduces the risk of water leakage related accidents.

Policy links

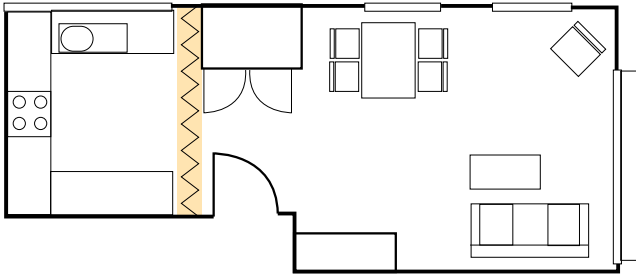
• Policy S.H1

• Policy D.H3

Design guideline 85

Partition walls within the flat should not be load bearing where possible. .

There should be scope to add or remove walls according to needs.



Partition walls can be easily added or removed.



Location of windows allows for future division.

Mixed and balanced communities

Children and young people

Everyday life

Buildings as systems

Flexibility and ease of adaptation can extend the lifespan of a development.

Flexibility through increasing or decreasing the number of rooms means residents can adapt the home as their needs change. For example a new family member or need for a specific office space.

Policy links

• Policy S.H1

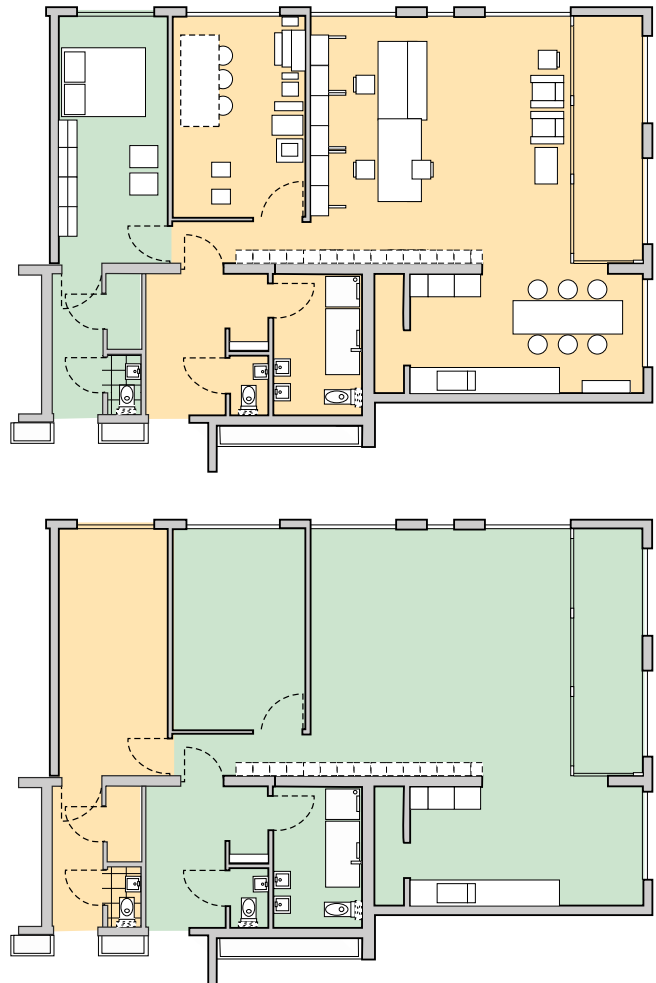
• Policy D.H3

Design guideline 86

Planning applications should indicate how typical home layouts can accommodate a range of functions, such as sleeping, eating, relaxing and working from home, with minimal conflict.

Further Consideration

The location and form of radiators and electrical sockets should be carefully considered. They should support flexibility of interior arrangements and take into account potential future reposition of some partition walls and built-in furniture.



Flat layout allows for different functions to take place at the same time with minimal conflict. The project provides a second front door entrance which allows a home working area to be accessed without the need to go through the living area.

● Everyday life

Case studies have found that non standard typologies result in difficult internal layouts where it can be hard to accommodate different furniture configurations.

This caused frustration for some residents we interviewed. They wanted open flexible living spaces which could be restricted by non standard room shapes and the location of plug sockets and radiators. Difficulties orientating furniture can be a particular challenge for home workers where workspace and private space such as the bedroom do not function well when co-located.

● Children and young people

● Everyday life

From case studies it is evident that two and three bed homes typically have one master bedroom, second and third bedrooms are typically smaller.

From interviews, this was difficult for flat sharers and restricted flexibility for families. On some occasions residents stated they would need to leave as their family grew.

Policy links

- Policy S.H1
- Policy D.H3

Design guideline 87

Windows should be above 80cm to accommodate furniture below.

If full height windows are essential to meet daylight sunlight requirements, or a part of façade design, layouts should demonstrate that furniture can be accommodated without blocking the window.



Furniture can comfortably fit underneath window sills.

● Everyday life

● Healthy neighbourhoods

Windows can restrict the orientation of furniture. This reduces flexibility, can result in a lack of privacy and has daylight/ sunlight implications.

Policy links

- Policy S.H1
- Policy D.H3

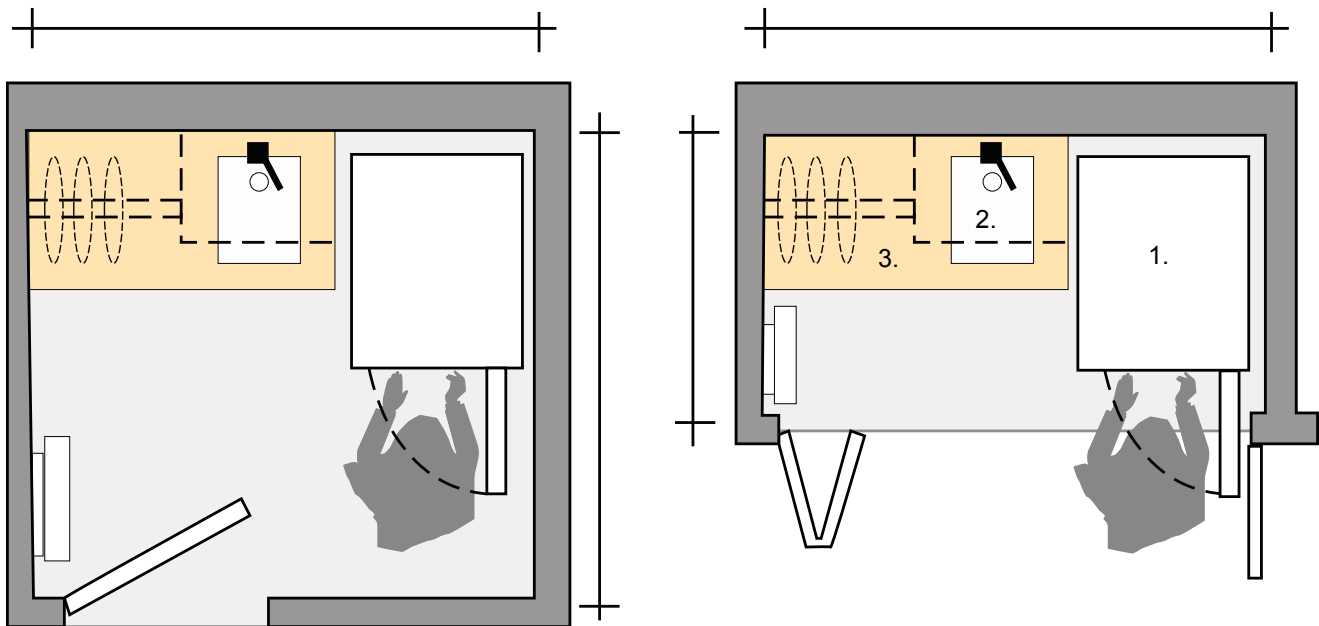
Design guideline 88

If a laundry cupboard is proposed this should:

- have sufficient space for a standard sized washing machine and space to dry clothes.
- be well ventilated.
- include an outlet for an iron or steamer.
- maximize vertical space for storage and to hang-dry items.
- provide space for a folding table, hamper,

ironing board and a high shelf or cabinet for safe detergent storage.

If this cannot be achieved, typical home layouts should identify how laundry can be conducted with minimal conflict to other uses.



Laundry closet layout

● Children and young people

● Everyday life

Due to small homes and overcrowding everyday activities and chores can be more difficult, particularly washing and drying clothes.

A number of schemes forbid the drying of clothes on private amenity space. Clothes must then be dried in the living room or bedroom. This takes up a lot of space, causes damp and can be unpleasant or ineffective if ventilation is poor.

A separate well insulated and ventilated laundry closet ensures chores can be conducted easily and the home remains a calm and relaxing space. This is particularly essential for families, the hard of hearing and dementia sufferers.

Policy links

• Policy S.H1

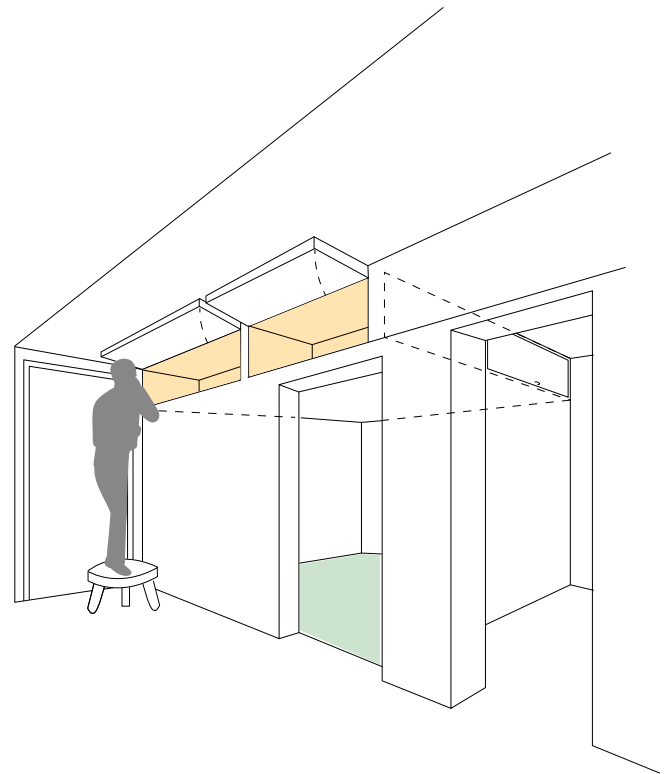
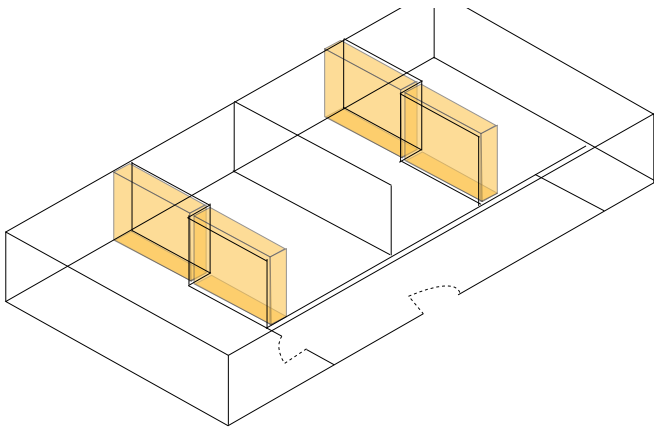
• Policy D.H3

Design guideline 89

Layout and design of the home should maximize opportunities for storage.

This could include built in features and spaces to accommodate furniture:

- Full height cupboards and/ or cabinets.
- Raised cupboards.
- Staggered partition walls.
- Walk in pantry or wardrobe.



Extra storage space can be provided at high level above service spaces such as bathrooms where lowered ceilings are acceptable.

Staggered walls can tidily fit furniture on either side.



Children and young people



Everyday life

64% of residents we spoke to found there to be a lack of storage. This resulted in clutter in the home and a less comfortable living environment.

From interviews, some residents kept belongings in boxes or in the homes of their friends and family. They would need to travel seasonally to swap items.

Policy links

- Policy S.H1
- Policy D.H3

Design guideline 90

Lockable stores could be provided elsewhere in the building for example within residential corridors or in basements. Location and materials should be fire safe.



Secure basement storage lockers.

● Children and young people

● Everyday life

Sufficient storage is essential to support residents needs as they change over time, particularly for families and those with illness.

● Buildings as systems

Storage in the basement can make efficient use of space that could not accommodate other uses.

Policy links

• Policy S.H1

• Policy D.H3

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The circular economy is one that keeps products, components and materials at their highest use and value at all times. It is an alternative to the current linear economy, where we make, use and then dispose of products, components and materials.

Construction and Materials

Building design and construction is key to embedding circular economy principles and achieving a zero carbon development. Design should reduce waste through salvage, use of recycled materials, modularity, ease of repair and re-use and a plan for disassembly.

From inception, design should also incorporate appropriate measures for the efficient and low carbon management of water, waste and energy resources, integrating these into the initial design to increase effectiveness and reduce conflict.

This is particularly relevant for high density development due to the volume of construction and number of residents. Tall buildings are traditionally harder to maintain and repair, so consideration at the offset reduces costs over the building's lifespan. The neighbourhood within which most high density and tall buildings are located are also highly constrained, restricting demolition methods at the end of the building's life.



Construction materials are made up of waste from decommissioned buildings.

London Plan*Policy GG6 Increasing efficiency and resilience*

To help London become a more efficient and resilient city, those involved in planning and development must:

A seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050.

B ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating against and avoiding contributing to the urban heat island effect.

Policy SI7 Reducing waste and supporting the circular economy

B. Referable applications should promote circular economy outcomes and aim to be net-zero waste. A circular economy statement should be submitted, to demonstrate:

- 1. How all materials arising from demolition and remediation works will be re-used and/ or recycled*
- 2. How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.*

Local Plan*Policy S.DH1 Delivering high quality design*

Development is required to:

e. use high quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development.

Policy S.MW1 Managing our waste

8. New development will be expected to reuse and recycle construction, demolition and excavation waste on or close to the site where it arises.

Design guideline 91

The embodied carbon of a development should be minimised wherever possible. This could be achieved through:

- Modularisation and product standardisation
- Consideration of how the building will be deconstructed to maximise reuse, salvage or recyclability of components.
- Maximise use of recycled and recyclable materials.



Upcycled materials reduce construction waste and create an interesting facade.

● Everyday life

● Buildings as systems

Standardised components across the build reduce costs, complexity of construction and waste.

Standardisation makes for easier maintenance by reducing the range of parts required and replicating repair processes. This in turn can extend the lifespan of the development and individual building elements.

Extending the lifespan of the building and individual elements reduces the demand for raw materials.

Modular construction can increase opportunities for off site construction, reducing construction programmes and disturbance to existing residents.

Policy links

- Policy S.DH1
- Policy D.ES7
- Policy S.MW1

Design guideline 92

Establish with building operations teams areas or items with excessive wear or regular replacement. These should be particularly robust and easy to access.

Items may include:

- Lifts.
- Lighting.
- Filters for heating and ventilation.
- Water pumps and valves.
- Water and waste piping.



Lighting at Schiphol airport is rented from and managed by Philips, reducing energy consumption and waste.

● Everyday life

● Buildings as systems

From interviews, regular damage to lifts and waste chutes occurred in some case studies. This caused frustration for residents and resulted in additional strain on building managers. For example, waste would be left in bags adjacent to lift chutes on every floor. Some residents were frustrated by signs of wear and tear in communal spaces, particularly stains and marks on communal corridors and carpets. Finishes such as glazed brick and tiling would take longer to show signs of wear and would be easier to clean. This reduces building maintenance costs and improves resident experience.

Policy links

- Policy S.DH1
- Policy S.MW1
- Policy S.DH3
- Policy D.ES7

High density development should achieve the best possible environmental conditions to promote resident's health and well-being. This must be achieved alongside meeting the sustainable construction and energy efficiency objectives for new buildings. A holistic approach is required to balance environmental parameters, and this requires consideration from the offset to shape massing and internal layouts.

The guidance has been developed following modelling of nine high density case studies across the borough to understand the balance of environmental parameters and provide a more integrated approach to optimise design trade-offs.

Flat layouts

Massing and internal layouts should priorities dual aspect and shallow single aspect homes achieve more enjoyable internal spaces, particularly access to daylight and sunlight and cross ventilation.

Daylight in buildings has been considered an important aspect of the built environment for centuries for its influence on occupant health, wellbeing and productivity. Direct sunlight can contribute to making an indoor space pleasant and enjoyable. Sunlight also provides direct solar gains which can passively heat a space during the winter but could also contribute to overheating in summer.

Mitigation measures

Mitigation measures outlined in the guidance can vary in response to layout and context.

Varied floor to ceiling heights and increased glazing can improve access to daylight and sunlight. Greater glazing in particular is a common design feature of tall buildings however

summer solar gains can significantly contribute to overheating in homes, an issue likely to be exacerbated by climate change. Greater glazing also needs to be balanced against potential increase in building fabric losses and implications on energy use and carbon emissions. For example larger windows will potentially reduce the overall thermal performance of the building envelope. This can be mitigated with higher specification glazing, but with an increase in construction costs.

Noise

Building regulations on noise insulation has increased in recent years. Provided this is adequately installed, noise between homes can cause fewer disturbances than residential corridors or external sources such as a road. Proximity to major noise sources can restrict the ability to ventilate the home.

Outlook and privacy

Alongside daylight and sunlight, outlook plays an important part in occupant's wellbeing in residential buildings. In some circumstances, good views out can effectively mitigate reduced levels of daylight and sunlight. Privacy is also an important aspect in residential dwellings, where occupants value having their own private space, without overlooking from neighbours. Poor privacy may result in curtains being regularly drawn and loss of daylight, sunlight and views out.

London Plan*Policy D6 Housing quality and standards*

D The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

D3 Optimising housing density site capacity through the design-led approach

- 7) deliver appropriate outlook, privacy and amenity*
- 9) help prevent or mitigate the impacts of noise and poor air quality*
- 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use*

London Housing SPG 2016

Standard 28 - Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.

Standard 29 - Developments should minimise the number of single aspect dwellings.

Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.

Standard 30 - The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound sensitive rooms within dwellings.

Standard 32 - All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.

Standard 33 - Minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least 'air quality neutral' and not lead to further

deterioration of existing poor air quality.

Standard 36 - Development proposals should demonstrate how the design of dwellings will avoid overheating without reliance on energy intensive mechanical cooling systems.

Local Plan*Policy D.H3 Housing standards and quality**Policy D.DH8 Amenity*

- 1. Development is required to protect and where possible enhance or increase the extent of the amenity development must:*
 - a. maintain good levels of privacy and avoiding an unreasonable level of overlooking or unacceptable increase in the sense of enclosure.*
 - b. ensure new and existing habitable rooms have an acceptable outlook.*
 - c. ensure adequate levels of daylight and sunlight for new residential developments, including amenity spaces within the development.*
 - d. not result in an unacceptable material deterioration of the sunlight and daylight conditions of surrounding development and not resulting in an unacceptable level of overshadowing to surrounding open space and private outdoor space.*
 - e. not create unacceptable levels of artificial light, odour, noise, fume or dust pollution during the construction and life of the development.*

Policy D.ES10 Overheating

- 1. New development is required to ensure that buildings (both internally and externally) and the spaces around them are designed to avoid overheating and excessive heat generation, while minimising the need for internal air conditioning systems.*

Design guideline 93

Development proposals should maximize the number of dual aspect homes (dual aspect through and dual aspect corner). If single aspect homes are proposed these should not be deeper than 7.5m.

Further Consideration

Changing the window to floor area ratio can balance daylight and sunlight with overheating. The following ratios are advised.

Through homes – window to floor area ratio
0.13-0.23

Corner homes – window to floor area ratio
below 0.28

Single aspect - window to floor area ratio
0.18-0.28



● Healthy neighbourhoods

Daylight in buildings has been considered an important aspect of the built environment for centuries for its influence on occupant health, wellbeing and productivity.

Environmental modelling of high density case studies can be found in the appendix.

Policy links

- Policy D.H3
- Policy D.DH8
- Policy D.ES10

Design guideline 94

Glazing specification should be considered as part of energy efficiency targets.

Further Consideration

Glazing at 72% VLT and above can improve daylight and sunlight levels to shallow single aspects homes (7.5m deep or less) and shallower though homes (11m deep or less).

Changes to glazing specification has limited improvements in deeper layouts.

Glass with a low U-Value can reduce heat loss, this tends to be most needed on dual aspect units or when window to floor area ratios are high.



Full ceiling height windows are at risk of overheating in summer and heat loss in winter.

● Healthy neighbourhood

Direct sunlight can contribute to making an indoor space pleasant and enjoyable. Sunlight also provides direct solar gains which can passively heat a space during the winter but could also contribute to overheating in summer.

Environmental modelling of high density case studies can be found in the appendix.

Policy links


- Policy D.H3
- Policy D.DH8
- Policy D.ES10
- Policy D.ES7

Design guideline 95

Floor to ceiling height should be generous. Consider varying floor to ceiling height across the building to optimize daylight/sunlight requirements. Homes at the lowest floors particularly if in close proximity to other buildings would benefit from an increased floor to ceiling height.

Further Consideration

Increasing floor to ceiling height has limited impact on single aspect homes deeper than 7.5m and dual aspect through homes deeper than 11m.

 Healthy neighbourhood

46% of residents we spoke to did not feel they had good levels of daylight and sunlight in the home. This was seen in interviews where there was disparity in light levels even within a building. Some felt there was not enough light to keep plants in the home.

Environmental modelling of high density case studies can be found in the appendix.

Policy links

- Policy D.H3
- Policy D.DH8
- Policy D.ES10

Design guideline 96

Natural ventilation should be maximised.



Windows and wintergardens can open wide for natural ventilation.

Healthy neighbourhood

The proportion of residents we spoke to who felt safe opening windows to ventilate their flat was consistent across ground to 20th floor, around 80%. This dropped from the 21st floor and above with approximately 34% feeling unsafe.

From interviews, balconies were appreciated as a way to ventilate the home. Ventilation and overheating was particularly difficult for residents we spoke to with no private amenity space and window restrictors.

Policy links

- Policy D.H3
- Policy D.DH8
- Policy D.ES7

Design guideline 97

Single aspect homes facing towards a major noise source should be avoided. Bedrooms of dual aspect homes should be orientated away from the source.

Homes should be sufficiently insulated from noise, including noise that comes from corridors and communal amenity spaces



Movement in corridors was a greater source of noise than between homes.

● Healthy neighbourhood

The response to noise varied significantly between buildings. On average, 57% did not feel they could hear their neighbour inside their flats.

More recent completions were better insulated than older buildings. From interviews, noise from the corridor and private amenity space was more of an issue.

Some residents we spoke who lived near a main road and/or train line had difficulty sleeping in summer months when windows had to be open to ventilate their home.

● Mixed and balanced communities

● Everyday life

Good noise insulation reduces stress and conflict between residents.

Policy links

- Policy D.ES9
- Policy D.DH8

Design guideline 98

Separation distances of a minimum of 18m between habitable rooms should be achieved to maintain good levels of privacy and avoid unreasonable overlooking. This should consider existing and future neighbours as well as between windows of the same building.

The application should demonstrate steps to improve privacy and outlook if separation distances fall below 18m. This could include staggering windows and/ or locating circulation space and communal rooms in tight locations.



Tall buildings and tight separation distances is detrimental for privacy.



Healthy neighbourhood

Alongside daylight and sunlight, outlook plays an important part in occupant's wellbeing in residential buildings. In some circumstances, good views out can effectively mitigate reduced levels of light.

54% of residents we spoke to did not feel they had good privacy. From interviews, some kept their curtains closed impacting access to daylight sunlight. Poor privacy also limited regular use of private amenity spaces.

34% of residents we spoke to living around high density buildings felt that the building impacted their privacy and outlook.

Policy links

- Policy D.H3
- Policy D.DH8


SECTION 5

APPENDIX

TBC

TBC

EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<p>Name of 'proposal' and how has it been implemented (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)</p>	<p>High Density Living Supplementary Planning Document</p>
<p>Directorate / Service</p>	<p>Place, Planning & Building Control</p>
<p>Lead officer</p>	<p>Lucia Cerrada Morato/Michael Ritchie</p>
<p>Signed off by (including date)</p>	
<p>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)</p>	<p> Proceed with implementation</p> <p>As a result of performing the QA checklist, the High Density Living SPD is not considered to have any adverse effects on people who share protected characteristics and no further actions are recommended at this stage. The potential impacts will be reconsidered in light of the outcomes of the proposed public consultation.</p>

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)
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1	Overview of proposal		
a	Are the outcomes of the proposals clear?	Yes	<p>The High Density Living Supplementary Planning Document (SPD) will provide design guidance for high-density residential and mixed-use development to ensure that this type of development contributes toward a high quality of life for residents.</p> <p>The SPD takes a holistic view of quality of life in high-density development and seeks to address a number of the sustainability objectives of the Tower Hamlets Local Plan, including:</p> <ul style="list-style-type: none"> ▪ Equality; reducing social exclusion and promoting equality. ▪ Liveability; promote, liveable, safe, high quality neighbourhoods with good quality services. ▪ Housing; ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability. ▪ Open space; enhance and increase open spaces that are high quality, networked and multi-functional. ▪ Climate change; ensure the incorporation of mitigation and adaptation measures to reduce and respond to the implications of climate change. ▪ Natural resources; ensure sustainable use and projection of natural resources, including water, land and air, and reduce waste.
b	Is it clear who will be or is likely to	Yes	The SPD is a borough wide

	be affected by what is being proposed (including service users and staff)? Is there information about the equality profile of those affected?		document that will potentially impact all those who live in Tower Hamlets, but especially those that live within, or near to, new high-density residential development. A review of the draft guidance has not revealed any instances where the content of the policies would give rise to adverse effects on people who shared protected characteristics.
2	Monitoring/collecting evidence/data and consultation		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	The impacts of the proposal have been considered in light of a range of qualitative and quantitative data. In particular, primary data was collected to help the council understand the borough's resident's experience of living in and around high-density development. This primary data was collected from surveys and semi-structured interviews, involving residents and neighbours. To ensure that data was from a range of different developments located across the borough. Quotas were used to ensure that data was collected from a range of different dwelling types, including from different tenures, different size of units and from different locations with each building. Surveys and interviews were conducted at a variety of different times of days, and where necessary, through an interpreter. Residents were given a choice of being interviewed at their home or a neutral location of their choice. All of the survey and interviews included information relating to protected characteristics so that results could be cross tabulated to

			understand the impacts on particular groups. All data was collected in compliance with GDPR regulations.
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	In addition to the primary data that has been collected, a variety of local, regional, national and international research had been consulted to help develop a better understanding of the ways in which high-density development impacts on resident's quality of life. This includes research carried by other council services, other local authorities, the Greater London Authority, developers building high-density housing, architects design high density housing and research carried out by the project team into how high-density housing is designed across Asia, Europe and North America.
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	From inception, the project has drawn on a range of knowledge and expertise to support the analysis of effects on people who share protected characteristics. For example, the project has drawn on the expertise from groups and individuals with expertise in child play, public health, waste management, sustainability, community engagement, development management and community cohesion.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	Early consultation with stakeholders and users from groups affected by the proposal include surveys and interviews with residents (including children and young people), interviews with building managers and caretakers and workshops with

			affordable housing providers and neighbourhood forums.
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?	Yes	Conclusions about the potential impact of the proposals have been drawn from the primary data that has been collected and corroborated by further research and engagement with experts and stakeholders.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	Yes	The proposed guidance seeks to improve the convenience and liveability of high density living environments for parents and their children, which will have a positive impact for the pregnancy and maternity characteristic. These improvements to living environments will also improve mobility, which will have a positive impact on some within the disability characteristic. The proposed guidance also seeks to address loneliness and isolation, which will have a positive impact on those within the age characteristic. The proposed guidance is considered to have no particular impacts on those that share the remaining characteristics (marriage and civil partnership, sexual orientation, sex, religion or belief, race and gender reassignment).
4	Mitigation and improvement action plan		
a	Is there an agreed action plan?	N/A	No adverse effects on people who share protected characteristics have been identified. As such, there is no requirement for an agreed action plan.
b	Have alternative options been	Yes	Alternative guidance options were

	explored		given careful consideration during the early development of the design guidance. The forthcoming public consultation may give rise to further guidance options, the equalities impacts of which will be assessed accordingly.
5	Quality assurance and monitoring		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	The council will put in place arrangements to continue to collect primary data about the resident's experiences of living in high density development. The onus to carry out these post occupancy evaluations will be placed on housing developers through legal agreements attached to planning permission. The implementation of planning policy and guidance is also monitored on a regular basis in the Annual Monitoring Report and the implementation of this guidance will also be considered as part of this process.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics?	Yes	The data that is collected from the post occupancy evaluations will include information about protected characteristics so that the council can evaluate the impact of the proposal on these groups.
6	Reporting outcomes and action plan		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	The report recommends that note is taken of the findings of this assessment.

**Appendix A
(Sample) Equality Assessment Criteria**

Decision	Action
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<p>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</p>	<p>Susp Furtl Requ</p>
<p>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.</p>	<p>Procc impl</p>

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High Density Living Supplementary Planning Document

Consultation and Engagement Report

25/07/2020

Table of Contents

Introduction	3
Background and Context	3
Role of the Consultation and Engagement Report	4
Consultation and Engagement	5
Approach	5
How we involved the community and stakeholders	5
Consultation Programme.....	8
Approach	8
Stage One – Project Scoping	8
Stage Two – Evidence Gathering	9
Stage Three – Options Testing	11
Stage Four – Statutory Consultation.....	12
Stage Five – Adoption	14
Consultation and Engagement Feedback	16
Overview and Summary	16
Appendix A.....	Error! Bookmark not defined.
Changes to the document.....	Error! Bookmark not defined.

Introduction

Background and Context

- 1.1 The Strategic Planning service has prepared a Supplementary Planning Document (SPD) that provides guidance on the design of high density residential and mixed use development. The SPD supports the new Local Plan to 2031, in particular Policy S.DH1- Delivering high quality design and Policy D.DH7 - Density. The project helps to deliver the Mayor's manifesto pledges to improve the quality and fairness of housing and make development work for local people. This responds to the National Planning Policy Framework (NPPF) and new London Plan, and will be prepared and adopted in accordance with the provisions in the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 The project responds to important recent changes in national and regional policy. Firstly, the significant emphasis that the new London Plan places on optimising housing density to deliver sufficient new homes and that, unlike its predecessor, the new London Plan does not set out target density ranges, and instead leaves upper density levels open, allowing boroughs to determine the appropriate development in the context of their existing character and densities. Secondly, the new NPPF and new London Plan place great emphasis on design quality to achieve high quality buildings and places. The NPPF encourages plans and supplementary guidance to provide maximum clarity about design expectations at an early stage through visual tools such as design guidelines. The High Density Living guidance seeks to provide a clear design vision and set expectations for future development in the borough.
- 1.3 The project's main objective is to ensure that the design of new high density development contributes toward a high-quality of life. It will also enable stakeholders, such as residents, Members, developers and officers, to better understand the role of design in high density residential and mixed-use development.

Role of the Consultation and Engagement Report

1.4 The SPD is subject to statutory preparation procedures under Regulations 16-19 of the Town and Country Planning (Local Development) (England) Regulations 2012. This Consultation and Engagement Report has been prepared to:

- provide an engagement framework that describes the main consultation methods that have been used;
- summaries the key issues raised by the community and stakeholders and;
- set out the Council's response to representations received, and how they have help shape the SPD.

Consultation and Engagement

Approach

1.5 The approach to consultation has been developed to be in conformity with the Council’s Statement of Community Involvement (SCI) (2019), the Corporate Handbook and in collaboration with the Communications Team. The overarching aim for consultation is to provide an opportunity for involvement from a wide range of local community groups and individuals.

How we involved the community and stakeholders

1.6 There are several distinct stages to consultation activities to progress SPDs. The table below sets out the stages in preparing the SPD and identifies where the community and key stakeholders had the opportunity to get involved.

Table 1 – High Density Living SPD Consultation Stages

Stage		Purpose of communication	How the stakeholders have their say
Stage 1 – Project scoping	April- July 2018	Agree the project vision, scope and methodology.	Workshops and one to one meetings
Stage 2 – Evidence Gathering	August 2018- January 2019 Additional survey June 2019	Gather evidence to understand how density impacts on quality of life and to support future recommendations.	Participating in surveys and interviews.
Stage 3 – Options testing	January- July 2019	Seek internal feedback on options for guidance and recommendations and decide on a way forward.	Workshops, co-design sessions and one to one meetings
Stage 4 - Statutory Consultation	March 9 th to May 15 th 2020	Publicise the proposed recommendations and guidance and seek feedback on them.	By writing to us, completing a survey and/or attending a consultation

			event.
Stage 5 -Adopting the SPD	December 2020	Disseminate the findings of the public consultation and decide on adoption of the guidance and recommendations.	N/A

1.7 Throughout the SPD preparation process, consultation techniques and activities were carried out to ensure an effective and efficient engagement. Some of these include:

Meeting with Elected Members

Regular engagement with Lead Member and wider members to ascertain community priorities and aspirations, to ensure community issues are fed into the SPD.

Public Exhibitions and Drop-in Sessions

Events within areas experiencing increasing residential density or near selected case studies were held. This included exhibitions summarising the research process, short films, copies of the document to be consulted and opportunities to discuss with Council Officers. Three in total were planned although only one was eventually conducted due to the onset of COVID-19 restrictions.

Developers Forum

At the outset a steering group was established with key developers to introduce the project and shape the research process. The project was later presented at the Tower Hamlets Developer’s Forum giving the opportunity for discussion and feedback in addition to opportunities for further involvement away from the Forum.

Internal Working Group

Regular meetings with internal officers to inform and update on the progress of the document. This included members of the housing, waste and highways teams as well as strategic planning and policy.

External Stakeholder Workshops

Workshops were held with various stakeholders at relevant registered providers to gain feedback on objectives and design strategies to meet these. In addition, meetings were held with various experts in specific topics such as child friendly design and the circular economy to shape more detailed guidance.

On-line updates

Regularly update the Council's website and social media platforms such as Facebook, Twitter and LinkedIn, to inform people of the consultation process and progress of the document.

Advert and/or Article in local newspaper

Advert in the East End Life to inform people of consultation events.

Flyers in Idea Stores

Flyers placed in Idea Stores to inform residents, workers and visitors of consultation events and activities.

Email and Letters

Contacted those on the Local Plan Consultation database to inform them of the consultation and upcoming events.

Consultation Programme

Approach

1.8 The consultation activities were broken down into five stages. The sections below outline the role of each stage of the SPD development process as well as key stakeholder groups, methods and time frames for each.

Stage One – Project Scoping

1.9 The purpose of the communication at this stage of the project is to agree the project vision, scope and methodology. Selected stakeholders, with technical knowledge of high-density development, were invited to form a sounding board to comment on the vision scope, and methodology.

Table 2 – Stage 1 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Housing Associations, Developers, Architects, Academics and other local planning authorities.	Sounding board	Two meetings held as a result of large numbers to discuss the project vision, scope and methodology.	July 2018
Members	Briefing	Mayors planning meeting, emails to Lead Member and a Member's bulletin.	June to September 2018

Corporate and Directorate leadership	Briefing	Meetings with Corporate Director for Place, CLT and DLT	August 2018
Conservation and Design Review Panel (CADAP)	Briefing	Presentation of the vision, scope and methodology to gain further feedback.	October 2018

Stage Two – Evidence Gathering

- 1.10 The purpose of the communication at this stage of the project is to gather evidence to understand how density impacts on quality of life and to support future recommendations.
- 1.11 Nine high density case studies were selected across the borough and two surveys conducted with both residents living within the buildings and those living or working around the building. Follow up qualitative interviews were also conducted.
- 1.12 Workshops were held with a range of stakeholders linked to the development and management of high density residential buildings. This included developers, architects, residents associations, building managers and various Council services.

Table 3 – Stage 2 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Residents (across the nine case studies)	Survey and semi-structured interviews	Residents of selected case study schemes, and those in the neighbourhood. Door-to-door, postal and online survey with follow-up semi-structured interviews. Over 500 residents were surveyed and 40 interviewed.	August to October 2018

Council services	Workshops	Themed workshops to explore the links between the design of high-density homes and neighbourhoods. Teams included Housing, Public Health, Sustainability, Public Realm, Transport, Waste, Services and leisure and Development Management.	October 2018
External services	Workshop	Workshop to explore density issues in relation to the Police service.	November 2018
Housing associations	Briefing and engagement	Presented and discussed the project with the Tower Hamlets Housing Forums. Subgroups engaged with include Development, Housing Management, Public Realm and Anti social behaviour.	August to November 2018
Developers	Sounding board	Interviews to explore density issues in relation to the development process.	July 2018
Architects	Semi-structured interviews	Interviews to explore density issues in relation to the design process. Architects contacted were responsible for the case studies assessed and include Brady Mallalieu, Allies and Morrison, SOM and LDS.	November 2018 to February 2019
Residents groups and Members	Workshop	Workshop to explore density issues with representatives from the Tower hamlets neighbourhood forums and relevant Members.	November 2018
Building managers and care takers	Site visits	Site visits were conducted with building managers and/ or care takers in each of the nine case studies to explore management issues and implications in greater depth.	November to December 2018

Neighbourhood survey	Survey	Residents living around the 9 case studies. Over 500 residents were surveyed.	June 2019
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Stage Three – Options Testing

1.13 Following the research phase, communication sought feedback on findings and options for guidance and recommendations.

Table 4 – Stage 3 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Political, Directorate and Corporate Leadership	Briefing	Lead Member one to one and the Isle of Dogs Regeneration board, DLT and CLT.	September to November 2019
Residents	Co-design workshops	Workshop at case study Goodman’s Field as part of the GLA’s Social Integration Lab.	June 2019
Experts groups	Workshop / meetings	Workshops held with Academics, policy makers and relevant manufacturers. This includes child development experts, researchers on the circular economy and home working, waste academics and manufacturers and water academics and manufacturers.	June to September 2019.
Councils services	Workshops	Workshop to explore options for guidance and recommendations and their interrelationships with	June to November 2019

		council services. This includes the Waste team, Public Health, Housing, Strategy, Policy and Performance and Communications.	
Housing associations	Workshop and Tower Hamlets Housing Forum	Workshop to explore options for guidance and recommendations and their implications for the development and management of residential developments.	October 2019
Development Management and Strategic Planning officers	Workshops	Workshop to explore options for guidance and recommendations and their implications for the development management process.	November 2019
Internal sounding board	Comments/feedback		November and December 2019
CADAP	Presentation	Presentation of research findings and options for guidance.	September 2019
Architects	Meetings	Discussion of research findings and options for guidance.	November to December 2019
Developers	Developers Forum	Presentation of research findings and options for guidance.	October 2019

Stage Four – Statutory Consultation

1.14 The statutory consultation period for the draft High Density Living SPD was originally planned for six weeks from March 9th 2020 to April 20th 2020. This included drop in sessions and exhibitions in three locations experiencing or likely to experience an increase in high density residential developments.

- 1.15 However, due to restrictions as a result of COVID-19, only the first event at the Whitechapel Idea Store could be held. The later drop in sessions and exhibitions were cancelled.
- 1.16 As a result, all exhibition material including a short film was made available online and changes to the consultation widely publicised.
- 1.17 The duration of the consultation period was extended by an additional four weeks to May 15th 2020, increasing the time for residents and other stakeholders to complete the survey or provide written representations.

Table 5 – Stage 4 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Members and Local Development Framework (LDF) Database and individuals involved in developing the SPD.	Launch Event	Event at the Whitechapel gallery to launch the consultation and draw attention to the research project and SPD beyond the borough.	March 2020
The general public and LDF Database.	Media campaign	Publication on the website, East End Life, emails, letters, posters etc, informing of consultation events and activities.	March to May 2020
The general public.	Drop In Sessions	To outline the research process, introduce and discuss the aims and objectives of the SPD as well as design solutions. These were planned in locations across the borough in locations experiencing an increase in high	March to May 2020

		<p>density residential development.</p> <p>This included an exhibition summarising the research process, a short film and copies of the document to review.</p> <p>Three were planned for Whitechapel, Bow and Canary Wharf but only the Whitechapel session held due to COVID-19 restrictions.</p>	
The general public.	Public Exhibition and hard copies of the SPD	<p>Following the drop in sessions exhibition material was planned to be retained in key locations within the Idea Stores including information about how to engage.</p> <p>Exhibitions were cancelled as a result of COVID 19 restrictions.</p>	Cancelled
The general public and LDF Database.	Online Consultation Portal	Online material including exhibition content, videos, the draft SPD, supporting material and details of how to comment.	March to May 2020
The general public and LDF Database.	Online survey and contact details	Survey developed and hosted via the consultation portal to structure responses to the SPD. An email address was also provided for written representations.	March to May 2020

Stage Five – Adoption

1.18 Following a review of the representations received through the statutory consultation process, the SPD was amended. The preparation for adoption then includes a briefing to all members and corporate and directorate leadership teams on the outcome of the consultation and the recommendations for the way forward.

Table 6 – Stage 5 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Planning Officers	Workshops	Workshops with members of Development Management to discuss representations received and amendments to the SPD.	July 2020
Statutory Environmental Bodies	SEA Screening Determination	To confirm that the SPD does not require an SEA, in accordance with the requirements of regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004.	September 2020
Political, Corporate and Directorate Leadership	Briefing	Mayors Planning Meeting, Lead Member one to one, CLT and DLT to brief on the outcome of the consultation and recommendations for the way forward.	September to November 2020

Consultation and Engagement Feedback

Overview and Summary

- 1.19 This section of the Consultation and Engagement Plan summarises the feedback arising from the consultation on the SPD. This includes representations and comments submitted, and the Council’s response to these. The comments and representations received through the consultation process have been used to finalise the SPD.
- 1.20 The statutory consultation period for the draft High Density Living SPD ran from March 9th to May 15th 2020, this includes the extension of time as a result of COVID 19.
- 1.21 Over 50 people attended the consultation events held by the Council. 62 sets of representations were received from Members, local residents, statutory consultees, landowners and developers during the consultation period, 33 in the form of written representations and 29 responses from a survey hosted in the online consultation portal.
- 1.22 A summary of the key issues that were raised from written representations and the survey are detailed in the table below. This is broken down into a summary of general comments on the document and the themes it covers and then comments on specific design guidelines.

Table 7 – Consultation Feedback Summary

General Comments	
Key Issues	Council Response
Comments praised the ambition and scope of the document but questioned how it would be applied and how much weight it would carry.	The introduction has been amended to add more details as to how to use the document and how it will be applied.
Comments found the document too lengthy.	The document has been streamlined from 132 to 98 design guidelines.

<p>Some design guidelines were stated to be beyond the scope of planning, contradictory to existing policy or a repetition of existing policy and/or guidance.</p>	<p>Guidelines contradictory to existing policy have been deleted or amended.</p> <p>The document aims to be a holistic and comprehensive guide to creating high density residential environments that support good quality of life. To retain comprehensiveness, guidelines drawn from existing policy or guidance will make reference to their source. If guidelines are beyond the scope of planning but important for delivering high quality places they have been marked 'Further Consideration'.</p>
<p>Some representations questioned the impact of COVID-19 on the appropriateness of high density residential environments and/or whether design should change.</p>	<p>Implications of COVID-19 is not fully understood however, the pandemic has given even more weight to some of the elements identified in the design guidelines including access to outdoor space.</p>
<p>The document was not deemed to make sufficient reference to fire and the Grenfell tragedy.</p>	<p>The focus of the SPD is on layouts rather than materials and building regulations, however the document has been amended to better address fire. Where appropriate guidelines have been amended to ensure they do not impact fire risk.</p>
<p>Some comments raised the impacts of construction on noise, vibration and the quality of the public realm, particularly for the movement of disabled residents.</p>	<p>This is considered beyond the scope of the SPD.</p>
<p>The document was not deemed to adequately address car parking.</p>	<p>Car parking and highways implications are covered through Local Plan policies and discussions with highways officers.</p>
<p>Comments on Design Guidelines</p>	
<p>Key Issues</p>	<p>Council Response</p>
<p>Guidelines on open space were considered more onerous than existing policy and specific area requirements unjustified.</p>	<p>The guidelines have been amended to better follow Local Plan policy by removing specific area requirements and referring to generous public realm.</p>
<p>Some representations resisted guidelines that sought to ensure public realm was delivered in addition to communal amenity space and play space requirements and sought that communal amenity space was accessible for the wider area especially</p>	<p>Better reference has been made to existing policy that seeks to avoid double counting, in particular tall building policy that requires communal amenity space specifically for residents of that development.</p> <p>Guideline 2 has been amended to outline the objectives of the three spaces required</p>

<p>in instances of estate regeneration.</p>	<p>(public realm, communal amenity space, play space) and options for how this can be achieved.</p>
<p>Survey responses from residents found access to open space to be insufficient and as a result did not feel homes were suitable for families. They requested development deliver more open space.</p>	<p>The SPD cannot request space above requirements outlined in the London and Local Plan. The introduction has been amended to better outline the role of the document.</p> <p>Research found families were living at high density and the document seeks to ensure these environments are suitable. This includes the design of public realm, location and design of play space and home layouts.</p>
<p>Some representations found servicing and delivery requirements, drop off space and recommendations for public realm features to be onerous.</p>	<p>Servicing and delivery and drop off guidelines were developed alongside the Council's Highways team and highways policies of the Local Plan and are deemed best practice for high density residential environments.</p> <p>The guidelines for features in the public realm provide options for achieving high quality spaces, it is not expected all will be delivered.</p>
<p>Some comments resisted guidelines including nurseries or public uses such as shops or cafes saying this should follow market demands.</p>	<p>The guideline has been amended to add flexibility according to market demands.</p>
<p>Representations questioned why traditional waste systems were not appropriate.</p>	<p>The response and guidelines refer back to the Local Plan which encourages other forms of waste collection.</p> <p>The document has also been amended in light of the emerging Waste SPD.</p>
<p>Comments found guidelines on outdoor environment to be repetitive.</p>	<p>The guidelines have been streamlined, outdoor environmental guidelines are now addressed in the 'around the building' section.</p>
<p>Representations felt there was insufficient reference to climate change, biodiversity and urban greening. Survey respondents in particular wanted more trees and green space.</p>	<p>Environmental guidelines have been reformulated to provide better clarity on requirements for biodiversity and green space.</p> <p>Numerous guidelines were developed in order to adapt and mitigate to climate</p>

	change however explicit reference has been made where appropriate.
Some representations resisted requirements that play be provided outdoor saying this was overly onerous.	From discussions with child development experts, outdoor play was deemed essential. Development is already expected to meet Play England's 10 design principles and it is not felt that this can be met indoors.
Survey responses from residents requested shared facilities stating lack of shared space resulted in segregation.	The guidelines encourage all outdoor amenity space to be shared to foster social integration.
There was strong difference in opinion over roof top play spaces. Some representations sought for these to be resisted due to anti-social behaviour and safety concerns. Other representations stated discouragement of roof top play was overly onerous and not supported by existing policy.	The document has been restructured and guidelines amended to encourage typologies where play can be delivered at the lower levels (podiums or courtyards). However, it also includes guidelines for measures play spaces must meet if provided elsewhere. This seeks to improve safety and increase the ease of management.
Some representations stated similar entrance lobbies and a shared concierge was unnecessary and would have service charge implications.	Guidelines on entrances and building management have been amended to provide various options that meet desired outcomes but with less impacts on service charge.
Survey responses found guidelines on cycling did not address the reasons why uptake was low; safety, distance and lack of good routes. Other representations felt specific cycle parking requirements to be arbitrary and not supported by existing policy.	The SPD is about the design of residential buildings so cycle routes and road layouts are beyond its scope. The document aims to make cycle storage safe and convenient. The guidelines on cycle storage have been amended to provide options.
Survey responses stated high density residential buildings were inappropriate living environments due to small sizes, lack of storage and high cost. Representations from developers stated it was unacceptable to ask for more than the nationally prescribed space standards or building regulations and that guidelines would impact development viability.	The SPD cannot request more than the nationally prescribed space standards. The guidelines on home layouts have been amended to outline how minimum space standards can be met in a way that maximises adaptability and flexibility to create homes where people can live long term.

1.23 In addition to the option to provide written feedback, the online survey was broken down into five sections covering the themes of the High Density Living SPD:

- Children and Young People
- Mixed and Balanced Communities
- Everyday Life
- Buildings and Systems
- Healthy Neighbourhoods

1.24 Survey respondents were asked to consider the main objectives for each of the five topics and whether the design guidelines would ensure that new high density residential development meet these objectives. This took the form of a quantitative survey in addition to written comments.

1.25 The table below outlines the results of the quantitative survey. The majority of survey respondents agreed the design guidelines would meet the desired objectives for each topic, Children and Young People and Buildings as Systems being most successful.

Table 8 – Quantitative Online Survey Summary

Topic 1 – Children and Young People				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
2 (7%)	14 (48%)	5 (17%)	5 (17%)	3 (10%)
Topic 2 – Mixed and Balanced Communities				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
5 (17%)	8 (28%)	8 (28%)	5 (17%)	3 (10%)
Topic 3 – Everyday Life				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
5 (17%)	9 (31%)	7 (24%)	7 (24%)	1 (4%)
Topic 4 – Buildings as Systems				

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
5 (17%)	13 (45%)	4 (14%)	5 (17%)	2 (6%)
Topic 5 – Healthy Neighbourhoods				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
4 (14%)	10 (34%)	7 (24%)	4 (14%)	4 (14%)

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Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report

High Density Living Supplementary Planning Document

Statement of Reasons

December 2020

Contents

1. Introduction
2. High Density Living Supplementary Planning Document
3. Legislative and Policy Context
4. Screening Exercise
5. Assessment of Likely Significant Effects
6. Habitats Regulation Assessment Screening
7. Conclusion
8. Consultation

1. Introduction

- 1.1. This screening exercise outlines the Council's consideration of whether the proposed High Density Living Supplementary Planning Document (SPD) (Regulation 14 consultation version, dated July 2020) should be subject to a Strategic Environmental Assessment (SEA) or Habitats Regulation Assessment (HRA).

- 1.2. This document constitutes the Council's Statement of Reasons for whether the High Density Living SPD requires a Strategic Environmental Assessment, as set out under Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. It is accompanied by a Determination Letter.

2. High Density Living Supplementary Planning Document

- 2.1 The High Density Living SPD sets out detailed guidance on the implementation of policies in the Tower Hamlets Local Plan 2031. It seeks to support the plan to ensure that new homes and neighbourhoods are designed to provide a high quality of life for existing and future residents in the borough's high density environments.
- 2.2 The SPD does not apply to a specific area in the Borough but will be applied across Tower Hamlets. As indicated in page x of the SPD, the document is relevant to residential and mixed use development that exceeds 1,100 habitable rooms per hectare or includes a tall building.
- 2.3 The high density living guidance seeks to provide a clear design vision and set expectations for future high density development in the borough. The guidance does not seek to focus just on how these buildings look but how these new forms of development can help to ensure that existing and future residents and people working in the building can enjoy a high quality of life. It supports the vision, objective and policies of the Tower Hamlets Local Plan 2031, supporting priority 1 - People are aspirational, independent and have equal access to opportunities -and 2 - A borough that our residents are proud of and love to live in- of the Mayor's Strategic Plan.
- 2.4 In particular, the SPD provides detailed guidance to help the council deliver its vision to support existing communities and welcome new residents to make their home within liveable, mixed, stable, inclusive and cohesive neighbourhoods, which contribute to a high quality of life and more healthy lifestyles. To achieve this, the guidance sets out how new development can share the benefits of growth in Tower Hamlets by contributing to the creation of healthy environments, encouraging physical activity, promoting good mental and physical wellbeing and reducing environmental impacts. It also demonstrates how the benefits of growth can be shared by creating mixed and balanced communities, delivering tenure-blind development and increasing opportunities for social interaction.
- 2.5 Accompanying the vision there are five topics papers which summarise the data gathered through the evidence gathering stage. These constitute the

main challenges and opportunities which manifest in high density developments. Topic papers also outline overarching objectives for each of these issues.

2.5.1 Children and young people. Objectives:

- Provide sufficient and varied space for children and young people to play and socialise.
- Make it easy for children to move around the building and use play spaces independently
- Integrate play space with other spaces and amenities to encourage use
- Allow play or gathering in most parts of the building -not just designated spaces
- Support play provision with facilities for adults

2.5.2 Sense of community. Objectives:

- Provide opportunities for residents to meet and interact with residents in the neighbourhood
- Provide opportunities for residents of different tenures and blocks to cross paths regularly
- Increase sense of safety, sense of belonging, familiarity and care
- Increase opportunities for residents to share space on a regular Basis

2.5.3 Everyday life. Objectives:

- Design to legitimise home based work addressing flexibility, isolation and nuisance
- Design should be flexible and easy to adapt to meet different needs as they change over time
- Design to consider the needs of pets and their owners
- Design should consider everyday activities and their implications on home standards
- Design standards acknowledge diverse users who experience spaces differently such as autism, dementia or those with poor eyesight.

2.5.4 Buildings as systems. Objectives:

- Reduce waste, particularly through the ease and efficiency of waste collection
- Reduce water use and the load on the water network
- Zero carbon through efficiencies and renewable energy
- Easy and efficient building management
- Facilitate the transition to the circular economy
- Cycling is safe and convenient

2.5.5 Healthy neighbourhoods. Objectives:

- The neighbourhood, communal spaces and the home are comfortable, attractive and enjoyable
- Residents have control over their environment
- Environmental parameters including daylight sunlight, overheating, energy demand, wind, outlook and noise are balanced holistically for optimal conditions
- Buildings and homes are resilient to the impacts of climate change

2.6 These objectives are then translated into 93 design guidelines structured around the different areas of the building:

- 2.6.1 Around the building
- 2.6.2 Communal spaces
- 2.6.3 Home

3. Legislative and Policy Context

Sustainability Appraisal (SA)

3.1 A Sustainability Appraisal (SA) considers the potential impacts of a planning policy document on the environmental, economic, and social aspects of sustainability. It does this by assessing the extent to which the planning document will help achieve a set of sustainability objectives that cover a range of issues, including air quality, landscape, water, health and the population. The SA also has to satisfy the requirements of the European 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 Directive – for more information, see below).

- 3.2 There is a statutory requirement for SAs to be produced for Development Plan Documents, but not for other kinds of planning documents. There is no legal requirement for an SA to be produced for a supplementary planning document (PPG on Strategic Environmental Assessment and Sustainability Appraisal, paragraph 026).
- 3.3 An SA was undertaken in 2017 as part of the Integrated Impact Assessment (IIA) of the Tower Hamlets Local Plan 2031, with an addendum added in March 2019 to cover modifications to the plan. The plan (and its SA) underwent an examination in public and was adopted in January 2020.
- 3.4 The sustainability objectives for the Local Plan SA were developed through a comparison of existing sustainability objectives in the borough, the objectives of the Local Plan, and the identification of sustainability issues through the scoping process for the IIA. The SA was publicly consulted on as part of the consultation process for the Local Plan. The sustainability objectives from that SA are set out in table 1 below.

<p>1. Equality: reduce poverty and social exclusion and promote equality for all communities.</p> <p>2. Liveability: promote liveable, safe, high quality neighbourhoods with good quality public services.</p> <p>3. Health and wellbeing: improve the health and wellbeing of the population and reduce health inequalities.</p> <p>4. Housing: ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.</p> <p>5. Transport and mobility: create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.</p> <p>6. Education: increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.</p> <p>7. Employment: reduce worklessness and increase employment opportunities for all residents. 8. Economic growth: create and sustain local economic growth across a range of sectors and business sizes.</p> <p>9. Town centres: promote diverse and economically thriving town centres.</p> <p>10. Design and heritage: enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.</p> <p>11. Open space: enhance and increase open spaces that are high quality, networked, and multi-functional.</p> <p>12. Climate change: ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.</p> <p>13. Biodiversity: protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.</p> <p>14. Natural resources: ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.</p> <p>15. Flood risk reduction and management: to minimise and manage the risk of flooding.</p> <p>16. Contaminated land: improve land quality and ensure mitigation of adverse effects of contaminated land on human health.</p>
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Table 1: Tower Hamlets Local Plan Integrated Impact Assessment Sustainability Objectives (2017)

Strategic Environmental Assessment (SEA)

- 3.5 A Strategic Environmental Assessment (SEA) is an assessment of the likely effects of a plan or programme on the environment. The requirement for an SEA is set out in the SEA Directive (2001/42/EC), transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (known as the SEA Regulations). This particularly relates to plans which designate sites for development.
- 3.6 The purpose of an SEA is to ensure a high level of protection of the environment and to integrate consideration of the environment into the preparation and adoption of plans with a view to promoting sustainable development. SEAs must take account of the likely significant effects on the environment, including on issues such as biodiversity, population and human health, fauna, flora, soil, water, air quality, climate, material assets, cultural heritage, landscape, and the interrelationship between these factors. The SEA process sets out criteria for assessing the significance of the impact of a plan on the environment. If a significant effect is possible the assessment requires the consideration of alternative options.
- 3.7 SEA considers only the environmental effects of a plan, whereas SA considers the plan's wider economic and social effects in addition to its potential environmental impacts. The requirements of the SEA are subsumed within the requirements of the SA – that is, an SA requires all the detail expected of an SEA, and then more. Therefore, the objectives developed as part of the SA of the Local Plan can be extracted to cover the required considerations for an SEA. The correspondence between the SA objectives and the likely significant effects for an SEA to consider are set out in Appendix C of the Integrated Impact Assessment, and summarised in table 2 below. These are the SA objectives that will be used when considering the effects of the Spitalfields Neighbourhood Plan for the purpose of the SEA screening.

SEA Dimension	Relevant SA Objective
Biodiversity, Flora and Fauna	13. Biodiversity
Population and Human Health	2. Liveability

	3. Health and Wellbeing
Soil	14. Natural Resources 16. Contaminated Land
Water	14. Natural Resources 15. Flood Risk Reduction and Management
Air Quality	14. Natural Resources
Climate	12. Climate Change
Material Assets	14. Natural Resources 15. Flood Risk Reduction and Management 16. Contaminated Land
Cultural Heritage	10. Design and Heritage
Landscape	10. Design and Heritage 11. Open Space

Table 2: Correspondence between SEA dimensions and SA objectives

3.8 A **supplementary planning document** is considered to be a plan or programme as defined by the SEA Regulations. Under Article 3(3) of the SEA Directive, plans or programmes which “determine the use of small areas at a local level” or constitute “minor modifications to plans and programmes” only require an SEA if there are likely to be significant environmental effects that have not already have been assessed during the preparation of the Local Plan. Regulation 9 of the SEA Regulations requires the responsible authority (Tower Hamlets Council in this case) to undertake a screening exercise to determine whether or not a plan or programme is likely to have significant environmental effects and would therefore be subject to an SEA. This is also set out in the PPG on Strategic Environmental Assessment and Sustainability Appraisal, paragraph 008.

3.9 The screening exercise looks at the proposals in the SPD to see if a significant effect is likely. The criteria for the screening exercise are set out in the relevant legislation and explained in the next section of this report.

Habitats Regulation Assessment (HRA)

- 3.10 Habitats Regulation Assessment (HRA) is a process which looks at the potential impact of proposals within a plan (either individually or in combination with others) on European protected wildlife sites – consisting of Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar wetland sites. This assessment is required by the European Habitats Directive (92/43/EEC), transposed into UK law as the Conservation of Habitats and Species Regulations 2017 (as amended).
- 3.11 The initial stage of the HRA process involves consideration of the reasons for designation and the conservation objectives of each designated wildlife site within a reasonable distance of the neighbourhood plan area, and the potential impact of proposals within the plan on these sites.

4 Screening Exercise

4.1 The process of screening a plan or programme to determine whether an SEA is required is set out in figure 2 below. This figure is taken from A Practical Guide to the Strategic Environmental Assessment Directive, issued by the Office of the Deputy Prime Minister in 2005. This approach is commonly used in SEA screening exercises at the current time.

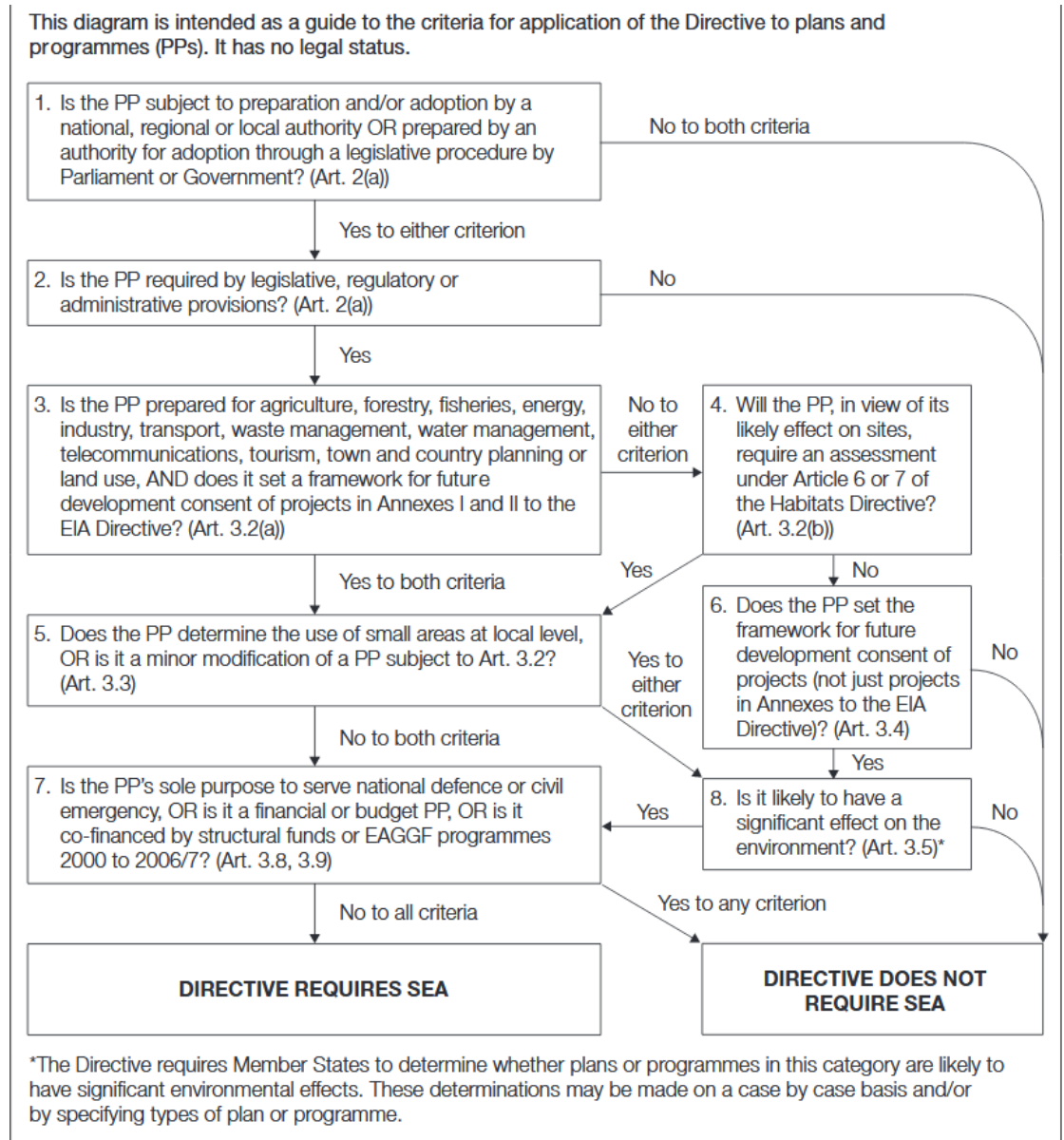


Figure 2: Application of the SEA Directive to plans and Programmes

4.2 Table 3 below assesses the High Density Living SPD against the criteria in figure 2.

Stage	Y/N	Reason
1. Is the plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Article 2(a))	Y	The SPD will be prepared and adopted by Tower Hamlets Council in its role as Local Planning Authority.
2. Is the plan required by legislative, regulatory or administrative provisions? (Article 2(a))	N	The preparation of a supplementary planning document is optional. However, once adopted it will be a material consideration when determining planning applications. It is therefore considered important that the screening process considers whether the High Density Living SPD is likely to have significant environmental effects invoking the need for a full SEA, and the assessment should proceed to step 3.
3. Is the plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article 3.2(a))	Y N	The SPD is intended to provide further guidance to Tower Hamlets Local Plan 2031 which is the planning policy framework for its area, including policy for land-use. The Local Plan has been subject to full Sustainability Appraisal (including SEA). However, it relates only to the design of individual new high density residential development and therefore it does not set a framework for future development consent for projects listed in the Schedule II of the EIA Directive. (No to either criterion, go to question 4)
4. Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	N	The Tower Hamlets Local Plan 2031 (January 2020) rules out any adverse effects on Natura 2000 sites. As the SPD will not change or add to policy, proposals or designations within the Local Plan, it is not considered that further screening for such assessment is

		necessary as there would be no likely effects on European Sites.
5. Does the plan determine the use of small areas at local level, OR is it a minor modification of a plan or programme subject to Article 3.2? (Article 3.3)	N	The SPD will be a material consideration in the consideration of planning applications for new high density development proposals in the Borough. The SPD does not modify the plan, just adds detail to it and doesn't determine use of sites. The SPD only recommends guidance for high density developments that happen to be proposed.
6. Does the plan set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Article 3.4)	N	The SPD will be a material consideration in the consideration of planning applications for new high density development proposals in the Borough.
7. Is the plan's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Articles 3.7, 3.8)	N	The SPD does not address these issues.
8. Is it likely to have a significant effect on the environment? (Article 3.5)	N	<p>It is not likely that the SPD will have any significant effect within Tower Hamlets that has not already been assessed through Sustainability Appraisal (including SEA) of the Tower Hamlets Local Plan 2031.</p> <p>The assessment of Local Plan policies relevant to high density residential developments concluded that there were predominantly positive impacts and no overall negative impacts when assessed against the Local Plan SA Objectives.</p> <p>The additional guidance which supplements each policy in the SPD will provide further detail tailored to inform high density residential design. Although there may be some environmental effects of providing specific guidance, the assessment of significant effects has already been covered in</p>

	<p>principle in the SA of the Local Plan.</p> <p>Therefore, it is considered that the SPD does not need to be subject to further SEA. In addition, each policy has already been assessed through Sustainability Appraisal (including SEA) of the Local Plan. Local Plan policies that are likely to be specifically within the scope of the further guidance within the SPD are as follows:</p> <ul style="list-style-type: none"> • Policy S.DH1: Delivering high quality design • Policy D.DH2: Attractive streets, spaces and public realm • Policy D.DH6: Tall buildings • Policy D.DH7: Density • Policy D.DH8: Amenity • Policy D.H3: Housing standards and quality • Policy S.CF1: Supporting community facilities • Policy D.CF3: New and enhanced community facilities • Policy S.OWS1: Creating a network of open spaces • Policy D.OWS3: Open space and green grid networks • Policy S.ES1: Protecting and enhancing our environment • Policy D.ES2: Air quality • Policy D.ES3: Urban greening and Biodiversity • Policy D.ES5: Sustainable drainage • Policy D.ES6: Sustainable water use and infrastructure and wastewater management
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	<ul style="list-style-type: none"> • Policy D.ES7: A zero carbon borough • Policy D.ES9: Noise and vibration • Policy D.ES10: Overheating • Policy D.MW3: Waste collection facilities in new development
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Table 3: SEA Screening of the High Density Living SPD

- 4.3 The conclusion of the assessment is that an SEA is only required if the Supplementary Planning Document is likely to have significant effects on the environment. Section 5 of this report provides a detailed assessment of the likely significance of effects to determine whether this is the case.
- 4.4 Section 5 of this report will then screen the High Density Living SPD to determine whether a full HRA is required.

5. Assessment of Likely Significant Effects

5.1 The criteria for assessing the likely significance of effects stemming from a plan or programme are set out in Annex II of the SEA Directive (Schedule 1 of the SEA Regulations), and are quoted below in box 3.

1. The characteristics of plans, having regard, in particular, to:
 - The degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources
 - The degree to which the plan influences other plans and programmes including those in a hierarchy
 - The relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development
 - Environmental problems relevant to the plan
 - The relevance of the plan for the implementation of Community [i.e. European Community] legislation on the environment (e.g. plans and programmes linked to waste management or water protection)

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
 - The probability, duration, frequency and reversibility of the effects
 - The cumulative nature of the effects
 - The transboundary nature of the effects
 - The risks to human health or the environment (e.g. due to accidents)
 - The magnitude and spatial extent of the effects (geographical area and size of the population to be affected)
 - The value and vulnerability of the area likely to be affected due to:
 - Special natural characteristics or cultural heritage
 - Exceeded environmental quality standards or limit values
 - Intensive land-use
 - The effects on areas or landscapes which have a recognised national, [European] Community or international protection status

	SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)	Comment
The characteristics of plans and programmes, having regard, in particular, to:		
1a)	The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The SPD will provide further guidance to the policies, proposals and the allocations that are contained within the Tower Hamlets Local Plan 2031 which already sets the framework for the development projects and activities that could occur within the Tower Hamlets area. The Local Plan as a whole, including those policies relevant to housing and tall buildings design, have been fully assessed for the purposes of SA/SEA. There will be no new policies or site allocations contained in the SPD. The SPD provides further information and guidance on implementation and interpretation of the existing policies through specific design details (for example materials, room layouts, location of spaces etc.)
1b)	The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The High Density Living SPD, in providing further guidance to the framework set within the Local Plan, does not directly affect other specific public sector plans or programmes but rather is influenced by the Local Plan and other higher tier planning policy, including the NPPF.
1c)	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	The Local Plan and other higher level policies set the context for achieving sustainable development. The SPD will provide further guidance as to how this can be achieved (for example by providing design recommendations on biodiversity). The SPD will not revisit or change the higher level policy requirements which have been subject to SA/SEA. The SA Report (March 2019) shows that the policies relevant to housing and tall buildings design have a positive impact overall and a

		specifically positive impact for the majority of the SA objectives when assessed against these. The SPD is intended to provide further guidance to Tower Hamlets Local Plan 2031 on how the high density buildings can be designed to meet the relevant policies including policies related to promoting sustainable development such as sustainable urban drainage, accessibility and safety.
1d)	Environmental problems relevant to the plan or programme	The Local Plan SA did not identify any negative effects against the SA Objectives for the policies relevant to housing and tall buildings design.
1e)	The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	It is unlikely that there would be any significant impact resulting from the further guidance for High Density Living SPD.
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a)	The probability, duration, frequency and reversibility of the effects	The SPD will cover the same period of time as the Tower Hamlets Local Plan 2031. A Sustainability Appraisal was undertaken for the Local Plan which included an assessment of the policies relevant to housing and tall buildings design that will be supplemented by the SPD. The evidence to support the SA for the Local Plan continues to be updated and the assessment looked at the probability, duration, frequency and reversibility of effects. Whilst the SPD will provide further guidance and supplement the existing policies in the Local Plan (and have largely positive effect), the probability, duration, frequency and reversibility of the effects from the implementation of the SPD will remain the same.
2b)	The cumulative nature of the effects	There are no likely cumulative effects that would result from the production of the High Density Living SPD.

2c)	The trans-boundary nature of the effects	There will be no national trans boundary effects resulting from the High Density Living SPD given that it will only apply on a district wide basis. Local administrative trans boundary effects were considered as part of the SA/SEA of the Local Plan.
2d)	The risks to human health or the environment (e.g. due to accidents)	Human health and environmental effects were assessed in the SA for the Local Plan (Policy S.ES1 - Protecting and enhancing our environment). No risks to human health or the environment were identified in relation to the policies relative to housing and tall buildings design. Further specific guidance on housing design will provide more certainty that the probable positive effects already assessed in the SA for the Local Plan will arise.
2e)	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The spatial extent of the SPD will be the same as the area covered in the Local Plan. The potential impacts of development proposals in this geographical area have been assessed as part of the SA/SEA of the Local Plan. The SPD will focus on the comprehensive approach to development delivery in a way which will enhance the consideration given to housing design and in turn reduce the likelihood of adverse impacts arising with respect to safety, access, parking, cycling, walking, flood risk and drainage.
2f)	The value and vulnerability of the area likely to be affected due to: I. special natural characteristics or cultural heritage, II. exceeded environmental quality standards or limit values III. intensive land use	The value and vulnerability of the area of the SPD have been considered as part of the SA/SEA of the Local Plan. The intensiveness of the proposed use of land is a factor for which information was available at the time of the SA/SEA assessment of the Local Plan and no significant impacts were identified in relation to this.
2g)	The effects on areas or landscapes which have a recognised national, Community or international protection status	The SPD is unlikely to result in significant effects on landscapes which have a recognised national, Community or international protection status.

6. Habitats Regulation and Assessment Screening

- 6.1 A Habitats Regulation Assessment (HRA) examines the potential impacts of a plan or programme, whether alone or cumulatively, on European protected sites. These sites are Special Protection Areas (SPAs) designated under the Bird Directive 79/409/EEC and Special Areas of Conservation (SACs) designated under the Habitats Directive 92/43/EEC. It is government policy that HRAs should also consider sites designated under the Ramsar Convention of 1971 (known as 'Ramsar sites') in the same way as the European protected sites.
- 6.2 The first stage of the HRA process is a screening exercise where the details of nearby designated sites are assessed to see if there is the potential for the plan or programme to have an impact on the sites. For the purposes of the screening exercise, the potential impact of the Spitalfields Neighbourhood Plan on designated sites within 15km of the neighbourhood area will be considered.
- 6.3 There are five European protected sites or Ramsar sites within 15km of the Spitalfields Neighbourhood Area. These sites are:
- Epping Forest SAC
 - Richmond Park SAC
 - Wimbledon Common SAC
 - Lee Valley SPA
 - Lee Valley Ramsar
- 6.4 None of these sites is closer than 3km to the neighbourhood area, so the plan cannot influence development in the direct vicinity of any of the sites.
- 6.5 The HRA of the Tower Hamlets Local Plan 2031 identified that the main reasons for 'unfavourable' ratings of the condition of the designated sites were due to public access, air pollution, and inappropriate management. The High Density Living SPD cannot affect the management of these sites, and therefore the only potential for adverse impacts on these sites from development in this

form would be through increased visitor pressure from a large population increase, or an increase in negative air quality impacts.

- 6.6 The High Density Living SPD provides design recommendations that aims to increase the level of greenery and biodiversity across the Borough, partially with the intention of improving air quality, although it is considered that the impact of this design recommendation will be no more significant than existing Tower Hamlets planning policies on this topic and is unlikely to have an effect on the designated sites.
- 6.7 The High Density Living SPD does not set any additional growth targets or site allocations, and therefore does not propose any more development than that planned for in the Tower Hamlets Local Plan 2031. The Local Plan was subject to an HRA screening as part of the Integrated Impact Assessment. This screening concluded that the Local Plan would have no significant effects (alone or in combination) on any of the sites due to an absence of impact pathways, policy controls within the plan which can ensure significant effects are avoided, and some suggested changes to the plan which were accepted by the Council and included in the adopted Local Plan. As part of the examination process, a technical note was appended to the HRA justifying how the Local Plan HRA was in line with the outcome of the 'People Over Wind' decision, and had not considered mitigation measures as part of the HRA screening process. This position was accepted by Natural England, and the Integrated Impact Assessment (including the HRA screening) was successfully examined as part of the Local Plan examination process.
- 6.8 As the scale of development proposed by the High Density Living SPD does not exceed that proposed by the Local Plan, it is considered that the High Density Living SPD cannot have any additional significant impact (either by itself or cumulatively with other plans and programmes) than the Local Plan itself. The findings of the HRA screening of the Local Plan are therefore considered to apply in this situation, and no further HRA screening of the High Density Living SPD is required.

7. Conclusion

- 7.1 On the basis of the SEA screening assessment carried out in this document, it is concluded that the High Density Living SPD will not have any significant effects in relation to the criteria set out in Schedule 1 of the SEA Regulations Hamlets that have not already been assessed through Sustainability Appraisal (including SEA) of the Tower Hamlets Local Plan 2031, and therefore does not need to be subject to a full SEA, as the SPD will not change or introduce new planning policy over and above the Tower Hamlets Local Plan 2031.
- 7.2 Therefore, it is considered that the SPD does not need to be subject to further SEA. The key areas where the SPD adds to the Local Plan policy is in terms of guidance for high density housing design with respect to masterplanning, access, design, walking/cycling networks, urban drainage, green infrastructure, biodiversity, and water management.
- 7.3 To conclude, it is not considered that SEA is a formal requirement given that the principles within the SPD have already been covered in the Local Plan SA.

8. Consultation

- 8.1 The draft report was sent for consultation to the three statutory consultees – Natural England, Historic England and the Environment Agency- as required under Regulation 11(1) of the SEA Regulations. The consultees were given six weeks to respond. Responses are reproduced below.
- 8.2 It is considered that the responses of the statutory consultees do not give rise to any further changes to the SEA/HRA Screening Report on its conclusions. Natural England did not have any comments. Historic England agreed that the SPD does not require a separate SEA given that the emerging local plan has been subject to a full Sustainability Appraisal. The Environmental Agency had no comments in regards to the SEA screening and pointed to recent evidence and studies in regards to water and management strategy to be noted in any future work on the topic.

Historic England

Date 08/12/2020

High density SPD screening

Please find attached brief Historic England response to the above consultation. Please come back to me if you require any further information.

Regards

Tim Brennan

Thank you for the opportunity to comment on the above consultation. As the Government’s adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

We would agree that the SPD in question does not require a separate SEA given that the emerging local plan has been subject to a full Sustainability Appraisal.

It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully,

Tim Brennan MRTPI
Historic Environmental Planning Adviser

Natural England

Date 12/11/2020

FW: FAO Ms L Cerrada Morato High Density Living Supplementary Planning Document - SEA/HRA Screening

FAO Ms Lucia Cerrada Morato

Dear Madam,
Please find attached below the response from Natural England for your information.

Yours faithfully,
Beth Seale

Beth Seale
Operations Delivery
Consultation Team

High Density Living Supplementary Planning Document - SEA/HRA Screening

Thank you for your consultation request on the above dated and received by Natural England on 28th October 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on this consultation.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours sincerely
Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

Date 09/12/2020

RE: Consultation on SEA/HRA Screening of High Density Living Supplementary Planning Document

Thank you for your consultation on the below. We do not normally comment on High Density Living documents however in this case we do have comments relating to water resources and management. We are pleased to see that *Reduce water use and the load on the water network* has been identified as one of the objectives. We would just like to draw your attention to the recently published Isle of Dogs & South Poplar Integrated Water Management Strategy (IWMS). With the Isle of Dogs & South Poplar being designated as an Opportunity Area for growth in the London Plan, and the expected level of development with the potential to significantly increase water demand in the Opportunity Area, leading in turn to additional pressure on the sewerage system. High density living areas will need to be mindful of impacts and enabling sustainable growth in areas classified as seriously water-stressed. The evidence in the IWMS indicates that the maximum potable water consumption target of 105 l/h/d (as specified in the Intention to Publish London Plan 2019 and the Tower Hamlets Local Plan 2031) is too high for the Isle of Dogs & South Poplar Opportunity Area, given the expected level of development. This is worth bearing in mind with the future development of the High Density Living SPD.

Please do not hesitate to contact me with any further queries.

Kind regards

Eleri

Eleri Randall

Sustainable Places Planning Advisor

Environment Agency - Hertfordshire & North London.

Appendix 1: Sustainability Appraisal of Local Plan Policies

- Policy S.DH1: Delivering high quality design
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy D.DH6: Tall buildings
- Policy D.DH7: Density
- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality
- Policy S.CF1: Supporting community facilities
- Policy D.CF3: New and enhanced community facilities
- Policy S.OWS1: Creating a network of open spaces
- Policy D.OWS3: Open space and green grid networks
- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES2: Air quality
- Policy D.ES3: Urban greening and Biodiversity
- Policy D.ES5: Sustainable drainage
- Policy D.ES6: Sustainable water use and infrastructure and wastewater management
- Policy D.ES7: A zero carbon borough
- Policy D.ES9: Noise and vibration
- Policy D.ES10: Overheating
- Policy D.MW3: Waste collection facilities in new development

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p>Likely Significant Effects</p> <p>Policy S.DH1 requires development proposals to demonstrate good design principles, partly to protect and enhance amenity – promoting mental and physical well-being of occupants/users of the site and neighbouring properties. S.DH1 also includes criteria to ensure that development proposals are adaptable to the changing needs of users and that open spaces are publicly accessible. These factors indirectly contribute to this SA objective through ensuring access to high quality places for a range of demographic groups, which could promote social cohesion and integration and reduce social exclusion.</p> <p>Policy D.DH2 requires development proposals to provide a range of public spaces that can function as places for social gatherings and also resists the creation of gated communities, a principal that is relevant to this objective. This could enhance social interactions within neighbourhoods, resulting in an indirect positive effect on this SA objective through improved social cohesion and integration.</p> <p>Policies D.DH6, D.DH7 and D.DH8 make a minor positive contribution and seek to ensure that all communities enjoy a comfortable living environment.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	~	~	~	+	+	+	~	~	~	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p>Likely Significant Effects</p> <p>Policy S.DH1 and Policy D.DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design. This would ensure that developments provide permeable, multi-functional and connecting street infrastructure and high quality public realm provision, such that these policies directly contribute to this SA objective.</p> <p>Policy S.DH1 also sets out criteria to ensure that development creates well connected and integrated places and that over - development of sites is avoided.</p>	++	++	~	~	~	+	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>It was previously suggested that Strategic policy S.DH1 could highlight the need for all development to incorporate designing out crime principles. Policy D.DH2 references Secured by Design.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>												
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p>Likely Significant Effects</p> <p>Policy S.DH1 requires development proposals to demonstrate good placemaking principles, seeking to ensure that developments are supported by publicly accessible open spaces that promote health and well-being. This would provide opportunities to participate in recreational activities, encourage active travel and increase social interactions, all of which would increase health and wellbeing and directly contribute to this SA objective. As such the policy would have a significant positive effect on this SA objective.</p> <p>Policy S.DH1 also sets out criteria to ensure that proposed developments are designed to be adaptable to the changing needs of users and that the effects on microclimate are taken into account. The policy also seeks to ensure that development mitigates the impacts of noise, overheating and air pollution. Consequently the policy would have a significant positive effect on this SA objective.</p> <p>Policy D.DH2 requires development proposals promote a well-connected, joined up and easily accessible street network and wider network of public spaces by taking steps to improve and enhance connectivity, permeability and legibility. This would encourage development proposals to embed active travel infrastructure within street networks, which could increase participation in, and the safety of, active travel, resulting in indirect positive physical health outcomes and therefore indirectly contributing to this SA objective.</p> <p>Policy D.DH6 makes a minor positive contribution by requiring developments with tall buildings, which include residential use, to provide high quality private and communal open space and play areas for local residents. Development outside of Tall Building Zones must also meet three criteria, which include demonstrating that it can deliver significant publicly accessible open space.</p> <p>Policy D.DH7 in relation to densities will contribute to this objective by ensuring that developments exceeding the appropriate density range in the London Plan should</p>	++	+	~	~	~	+	+	++	~	~	~	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>Uncertainties</p> <p>None identified.</p>												
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p>Likely Significant Effects</p> <p>There is no clear relationship between these policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	~	~	~	~	~	~	~	~	~	~	~	0
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p>Likely Significant Effects</p> <p>Policy S.DH1 and Policy D.DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design. These policies would improve the appearance of neighbourhoods and enhance the quality of the built environment, which would be likely to support investment by existing and new businesses, resulting in local business growth, wider economic growth and regeneration of neighbourhoods in need of socio-economic renewal. The policies would therefore have a significant positive effect on this SA objective.</p> <p>D.DH6 directs Tall Building proposals to designated Tall Building Zones. This could help create clusters of firms that desire such a location, it is uncertain how relevant this would be as a locational factor so a minor positive effect has been recorded.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p>	++	++	~	~	~	+	~	~	~	~	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>All of the policies therefore directly contribute to this SA objective and would have a significant positive effect on it through ensuring that development proposals are appropriately sited, designed and integrated with their surroundings.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>												
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>Likely Significant Effects</p> <p>Policy S.DH1 requires development proposals to provide a mix and range of publically accessible open spaces that promote biodiversity, health and well-being.</p> <p>Policy D.DH2 requires development proposals promote a well-connected, joined up and easily accessible street network and wider network of public spaces by taking steps to improve and enhance connectivity, permeability and legibility. As such the policy could help link and enhance open spaces, resulting in a significant positive effect on this SA objective.</p> <p>Policy D.DH6 makes a minor positive contribution by requiring developments with tall buildings to provide high quality private and communal open space and play areas for local residents. Development outside of Tall Building Zones must also demonstrate that it can deliver significant publicly accessible open space.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p>	++	++	?	?	?	+	?	?	?	?	?	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>Uncertainties</p> <p>None identified.</p>												
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p>Likely Significant Effects</p> <p>Policy S.DH1 requires development proposals to demonstrate good placemaking principles, including through the optimisation of energy and waste efficiency and measures to avoid overheating. As such the policy would contribute to and have a minor positive effect on this SA objective.</p> <p>Policy D.DH2 requires development proposals improve connectivity to public transport hubs, town centres, open spaces and social and community facilities. This would help ensure that streets and wider transport networks function efficiently, as well as encouraging active travel modes, reduced car travel and sustainable modal shifts. A minor positive effect is identified in relation to this objective as the resulting scale and significance of any reduction in carbon emissions is unknown.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	~	~	+	~	~	~	~	~	~	+
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p>Likely Significant Effects</p> <p>Policy S.DH1 requires development proposals to provide open spaces that promote biodiversity. As such the policy would contribute to and have a significant positive effect on this SA objective.</p> <p>Policy D.DH6 sets out criteria to assess the acceptability of tall building proposals, including specifically a requirement to avoid adverse impacts on biodiversity. This would safeguard ecological interests, although taking account of the narrow scope</p>	++	~	~	~	~	+	~	~	~	~	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>of this policy in relation to biodiversity, only a minor positive effect on this SA objective is predicted.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>												
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p>Likely Significant Effects</p> <p>Policy S.DH1 requires development proposals to optimise energy and waste efficiency. Consequently the policy would support the development of the circular economy and contribute to this SA objective.</p> <p>Policy D.DH2 requires development proposals to improve connectivity to public transport hubs, town centres, open spaces and social and community facilities. Consequently the policy could indirectly help to improve local air quality and therefore contribute to this SA objective.</p> <p>Policy D.DH6 includes a requirement that tall buildings do not have an adverse impact on watercourses and water bodies and a minor positive effect is identified on this basis.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p>	++	+	?	?	?	+	?	?	?	?	?	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>Uncertainties</p> <p>None identified.</p>												
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p>Likely Significant Effects</p> <p>Policies S.DH1 and D.DH2 require development proposals to incorporate high-quality public and open spaces, which could reduce surface run-off and therefore reduce flood risks. Consequently these policies contribute to and would have a significant positive effect on this SA objective.</p> <p>Policy D.DH6 requires proposals for tall buildings to demonstrate that they will not adversely impact on water courses and their hydrology, it also requires the provision of open space which could help reduce surface run-off.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	++	?	?	?	+	?	?	?	?	?	++
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p>Likely Significant Effects</p> <p>Policy D.DH8 safeguards human health by requiring development proposals to avoid unacceptable nuisances and pollution impacts. This would help to ensure that contaminated land is adequately and safely remediated, resulting in reduced adverse health risks. Consequently the policy would have a significant positive effect on this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p>	?	?	?	?	?	?	?	++	?	?	?	0

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>												

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><u>Likely Significant Effects</u></p> <p>Policies S.H1 D H4, D.H5 and D.H6 direct residential developments, including for specialist housing, to areas with high accessibility, the potential to accommodate high densities (including areas with existing high densities), suitable infrastructure provision and open space.</p> <p>Policy D.H2 aims to ensure the availability of affordable housing in new developments. It contains criteria for estate regeneration which requires development schemes to protect and enhance open space and community facilities, as well as bring existing homes up to the latest decent homes standard.</p> <p>Policy D.H3 requires residential developments to protect or re-provide existing and provide new amenity and play spaces. Through providing well designed residential developments in accessible locations these policies would improve access to local services, facilities and amenities, promote the development of a high quality public realm and ensure appropriate infrastructure provision.</p> <p>Policy D.H7 directs houses in multiple occupation (HMO) to areas of high transport accessibility. Significant positive effects are anticipated for the identified policies.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><u>Likely Significant Effects</u></p> <p>Policies S.H1, D.H4, D.H5 and D.H6 direct residential developments, including for specialist housing, to areas with high accessibility, suitable infrastructure provision and open space. Policy D.H3 requires residential developments to protect or re-provide existing and provide new amenity and play spaces. Through providing well designed residential developments in accessible locations these policies would improve access to open space and public services, which could include health and leisure/community facilities.</p> <p>Policy D.H2 requires affordable housing to share the same level of amenities as private housing, which could contribute positively to health, e.g. in relation to issues associated with noise.</p> <p>Policy S.H1 includes measures to ensure that estate regeneration schemes meet housing need.</p> <p>Policy D.H7 seeks to ensure that HMOs do not impact on local amenity and that relevant standards, including space standards are complied with.</p> <p>Significant positive effects are anticipated from all policies in this Chapter.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><u>Likely Significant Effects</u></p> <p>The policies would result in the provision of suitable housing of all types to meet identified needs, in particular by ensuring increased delivery of affordable housing and an appropriate range and mix of housing, prioritising the regeneration of existing housing estates (including measures to ensure that estate regeneration schemes meet housing need and requiring good housing design standards to be met).</p> <p>Significant positive effects are anticipated from all policies in this Chapter.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>The Council will continue to pursue a tenure split of 70% Social / Affordable Rent and 30% Intermediate housing, increase affordable housing provision the Government's emerging policy in relation to Starter Homes and how it will impact on this split creates uncertainties.</p>	++	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p>Likely Significant Effects</p> <p>Policies S.H1, D.H4, D.H5 and D.H6 direct residential developments, including for specialist housing, to areas with high accessibility and suitable infrastructure provision. This would have an indirect minor positive effect on this SA objective through improving the accessibility of the transport network, with potential secondary positive impacts in terms of sustainable modal shift, transport efficiency and providing support for investment to increase transport infrastructure capacity and connectivity. Policy D.H7 also directs HMOs to areas with high transport accessibility.</p> <p>As policies D.H2 and D.H3 do not direct housing to specific locations or specify different infrastructure requirements there is no clear relationship between the policy and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	~	~	+	+	+	+

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><u>Likely Significant Effects</u></p> <p>The policies do not directly contribute to this SA objective. However:</p> <ul style="list-style-type: none"> • Policies S.H1 and D.H5 provides a settled base for Gypsies and Travellers (G&Ts) which will enable any G&T children to access education facilities. • Policy D.H6 supports the provision of student housing close to education institutions and in highly accessible locations, which would enable the Borough to accommodate a growing student population and therefore indirectly contribute to the growth of education institutions and other learning opportunities. • Policy D.H7 contributes to this objective by requiring houses in multiple occupation to be located in areas of high transport accessibility. <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	~	~	~	+	+	+	+

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></p> <p>Policy D.H6 indirectly contributes to this SA objective as it directs student accommodation to highly accessible locations, which are likely to include Town Centres, which would increase footfall and support their vitality, a minor positive effect is identified on this basis. Policy D.H4 also directs housing for older and vulnerable people to locations with local services, which could indirectly support the vitality of Town Centres and other centres by maintaining and increasing footfall within them, a minor positive effect is also identified on this basis.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	+	~	+	~	+

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><u>Likely Significant Effects</u></p> <p>Policy S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through promoting high quality design. The policy also requires account to be taken of the cumulative effects of development. A minor positive effect is identified on this basis.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	+	~	~	~	~	~	~	0

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><u>Likely Significant Effects</u></p> <p>Policy S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through ensuring a placemaking approach to development, a minor positive effect is identified.</p> <p>Policy D.H3 sets minimum open space standards for residential developments and safeguards existing amenity space, therefore directly contributing to this SA objective and a significant positive effect is identified.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	+	~	++	~	~	~	~	0

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><u>Likely Significant Effects</u></p> <p>Policy S.H1 requires all residential development proposals to be appropriate, high-quality, well-designed and sustainable, which in general terms aligns will support alignment with this SA objective (in that it will include consideration of low carbon and zero carbon design, consistent with the Mayor's Housing Supplementary Planning Guidance).</p> <p>Policy D.H4 directs Specialist housing proposals to locations with good public transport accessibility and infrastructure. Policy D.H7 directs HMOs to areas of high transport accessibility. Policy D.H6 directs proposals for student accommodation to areas of high transport accessibility. In line with this SA objective these policies would indirectly ensure access to public transport for new residents, supporting sustainable modal shifts leading to carbon emissions reduction, minor positive effects are identified.</p> <p>As drafted there is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	~	~	+	~	+	+	+

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u></p> <p>None of the housing policies relate to site specific or detailed ecological matters, and in consequence there are no direct effects on this SA objective. However, Policy S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through requiring consideration of the relationship between the proposal and the surrounding environment including habitats and species. In addition policy D.H3 requires residential proposals to protect existing amenity space, which could indirectly safeguard habitats and therefore support this objective, minor positive effects are identified.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	+	~	+	~	~	~	~	+

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><u>Likely Significant Effects</u></p> <p>These policies do not directly contribute to this SA objective. However, Policies S.H1, D.H4 and D.H6 direct housing proposals to locations with good public transport accessibility and infrastructure. The proposed use of more sustainable, accessible locations which could indirectly safeguard air quality by maximising public transport commuting rather than increased car travel. As such the policies are predicted to have an indirect minor positive effect on this SA objective.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>Potential effects in relation to air quality are highlighted for consideration in other policies, e.g. Policy S.ES2.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	+	~	~	+	~	+	~	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
<p>1. Equality: Reduce poverty and social exclusion and promote equality for all communities.</p>	<p><u>Likely Significant Effects</u></p> <p>Policy S.CF1 requires development proposals to protect existing community facilities and contribute to the capacity, quality, usability and accessibility of existing facilities. This would directly contribute to this SA objective through increasing opportunities to reduce social exclusion and promote integration through community based activities.</p> <p>Policy D.CF2 sets out criteria to safeguard existing community facilities, which would protect existing opportunities to promote social cohesion and integration and therefore have a positive effect on this SA objective.</p> <p>Policy D.CF3 makes a minor positive contribution to this objective by directing new facilities locations that will be accessible to people living outside the development.</p> <p>Policy D.CSF4 seeks to protect existing public houses from development pressures and will make a minor positive contribution to this objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	+	+	+	++
<p>2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services</p>	<p><u>Likely Significant Effects</u></p> <p>Directly in alignment with this SA objective, these policies set out criteria to protect existing services and facilities and to support new ones in accessible and appropriate locations.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><u>Likely Significant Effects</u></p> <p>Policy S.CF1 requires development proposals to protect existing facilities and improve them and to deliver new facilities in appropriate locations. This would directly contribute to this SA objective and a significant positive effect is identified.</p> <p>Policy S.CF1 also directs proposals for new health infrastructure/facilities to accessible locations, which would ensure that enhanced infrastructure provision can increase access to healthcare services. As such this policy would directly contribute to this SA objective by addressing issues of wide and equitable access to health care facilities.</p> <p>Policy D.CF2 sets out criteria to safeguard existing community facilities (including health facilities), which will also directly contribute to this objective.</p> <p>Policy D.CF3 seeks to locate new community facilities at accessible locations and ensure that play space provision associated with schools can meet relevant standards.</p> <p>Policy D.CF4 seeks to protect existing public houses from development pressures. This could improve wellbeing through reducing social exclusion and increasing social cohesion, however the net positive effects of the policies are potentially reduced due to potential negative alcohol related health impacts resulting from a proliferation of social facilities and the retention of public houses.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	+	++
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><u>Likely Significant Effects</u></p> <p>There is potential for these policies to work in synergy with the housing policies to contribute towards the liveability aspects of this objective, resulting in a significant positive effect.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	<p><u>Uncertainties</u></p> <p>None identified.</p>					
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><u>Likely Significant Effects</u></p> <p>Policy S.CF1 and Policy D.CF3 direct proposals for new facilities and services to accessible locations including Town Centres and areas in accessible locations. As such the policies would link new community facility development with sustainable transport provision and could encourage sustainable modal shifts when accessing these facilities and services, resulting in a major positive effect on this SA objective.</p> <p>There is no clear relationship between the other policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	~	++	~	++
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><u>Likely Significant Effects</u></p> <p>Policy S.CF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new community facilities, including education facilities. This would directly contribute to this SA objective through enhancing education opportunities and facilities and supporting the Council in continuing to discharge their statutory education duties.</p> <p>Policy D.CF2 includes criteria for the extension of existing schools and a significant positive effect is identified.</p> <p>Policy D.CF3 provides support for the delivery of an expanded network of pre-school, school, further and higher education facilities and upgraded Ideas Stores (see supporting text to the policy). This would directly contribute to this SA objective through enhancing a range of education opportunities and facilities, which could also increase opportunities for adult learners to retrain or upskill.</p> <p>There is no clear relationship between Policy D.CF4 and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p>	++	++	++	~	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	<p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>					
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><u>Likely Significant Effects</u></p> <p>These policies support the provision of high quality education, community, social and cultural facilities in appropriate locations, which would indirectly contribute to this SA objective through providing opportunities for local employment.</p> <p>Policy D.CF3 would directly contribute to this SA objective by increasing opportunities to access adult, further and higher education facilities and therefore improve skill levels, resulting in reduced worklessness and improved access to employment.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	+	+	+	+
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><u>Likely Significant Effects</u></p> <p>These policies support the provision of high quality education, community, social and cultural facilities in appropriate locations, which would indirectly contribute to this SA objective through providing local employment and enabling the growth of certain economic sectors (e.g. arts, leisure & culture).</p> <p>D.CF2 sets out criteria to protect existing community facilities whilst policy D.CF3 requires proposals to demonstrate a local need for the facility. This would directly contribute to this SA objective through protecting the viability of existing facilities and thereby potentially supporting a range of existing organisations and associated employment.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p>	+	+	+	+	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	<p><u>Uncertainties</u></p> <p>None identified.</p>					
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></p> <p>Policy S.CF1 and Policy D.CF3 direct community, cultural and social facilities to locations within the Town Centre hierarchy. This would enhance the vitality of Town Centres and therefore directly contribute to this SA objective (a significant positive effect).</p> <p>Policy D.CF2 will contribute to this objective as it supports the retention of existing facilities, which could include those in town centre locations and a minor positive effect is identified on this basis.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	+	++	+	++
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><u>Likely Significant Effects</u></p> <p>As drafted there is no clear relationship between the CF policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><u>Likely Significant Effects</u></p> <p>Policy D.CF2 sets out criteria to protect existing community facilities (which could include an element of open space) and also requires that extensions to schools retain or increase the current level of child space. Policy D.CF3 could result in the creation of new open space associated with new schools, minor positive effects are identified on this basis.</p>	~	+	+	~	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	<p>There is no clear relationship between the other policies and this SA objective.</p> <p><u>Mitigation</u> None identified.</p> <p><u>Assumptions</u> None identified.</p> <p><u>Uncertainties</u> None identified.</p>					
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><u>Likely Significant Effects</u> Policies S.CF1 and D.CF3 direct proposals for new facilities and services to accessible locations, which could encourage sustainable modal shifts and thus contribute to the climate change SA objective.</p> <p>There is no clear relationship between the other policies and this SA objective.</p> <p><u>Mitigation</u> None identified</p> <p><u>Assumptions</u> None identified.</p> <p><u>Uncertainties</u> None identified.</p>	++	~	++	~	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u> There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u> None required.</p> <p><u>Assumptions</u> None identified.</p> <p><u>Uncertainties</u> None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p>Likely Significant Effects</p> <p>Policies S.CF1 and D.CF3 direct proposals for new facilities and services to accessible locations, which could encourage sustainable modal shifts and thus contribute to the achievement of this objective.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	~	++	~	++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p>Likely Significant Effects</p> <p>Policies S.CF1 and D. CF3 provide the opportunity to introduce new open spaces, e.g. associated with schools that could help mitigate flood risk and a minor positive effect is identified against this objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	~	+	~	+
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p>Likely Significant Effects</p> <p>There is no clear relationship between these policies and this SA objective.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	None identified.					

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><u>Likely Significant Effects</u></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks, including the temporary use of vacant developable sites. The policies would therefore facilitate increased use of open spaces by a range of population groups, which could stimulate increased participation in recreational activities, thereby reducing social exclusion and promoting integration. For these reasons the policies would contribute directly to this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><u>Likely Significant Effects</u></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors. In addition to improving physical access and provision the policies require development proposals to safeguard amenity and the existing use of open and water spaces. Therefore the policies would directly contribute to this SA objective through increasing access to a range of open spaces (and, equally, water spaces) and indirectly promoting improvements to public realm.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None required.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><u>Likely Significant Effects</u></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors. This would directly protect and enhance access to open space facilities and would also promote increased use of open (and water) spaces for a range of uses including public recreational activities. Consequently the policies would support improved health (physical and mental) and wellbeing outcomes and could also reduce health inequalities. Therefore these policies directly contribute to this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><u>Likely Significant Effects</u></p> <p>There is potential for these policies to work in synergy with the housing policies to contribute towards this objective by ensuring that new housing benefits from well-located open space, resulting in a significant positive effect. Policy D.OWS4 also provide criteria relating to the provision of residential moorings.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p>Likely Significant Effects</p> <p>Policies S.OWS2 and D.OWS4 require development proposals to protect navigation and water transport uses from adverse impacts, as well as to enhance the use of water spaces and the network of water spaces. This would safeguard and could also enhance the use of waterways for passenger and freight transport, which would increase transport efficiency and encourage in sustainable modal shifts. As such these two policies would directly contribute to this SA objective resulting in a significant positive effect.</p> <p>Other policies will help ensure that open spaces contribute to the Green Grid and provide well connected open space that will enable walking and cycling. As such, the policies would directly contribute to this SA objective resulting in significant positive effects.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	++	++	++	++
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p>Likely Significant Effects</p> <p>There is no clear relationship between these policies and this SA objective. However, it should be noted that open spaces and water spaces can provide suitable environments for some learning activities, so their enhancement and protection through these policies has the potential to deliver beneficial outcomes in relation to this SA objective, resulting in a minor positive effect.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	+	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><u>Likely Significant Effects</u></p> <p>The requirement within Policies S.OWS2 and D.OWS4 to protect navigation and not to compromise other water uses would safeguard existing economic activity and therefore also employment within existing water spaces and the network of water spaces, in particular ensuring the continuation of water transport activities. However, these policies largely set out safeguards for existing water space uses rather than encouraging economic growth or new employment within them; therefore there is no significant relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><u>Likely Significant Effects</u></p> <p>The requirements within Policies S.OWS2 and D.OWS4 for development proposals to protect navigation and not to compromise other water uses would safeguard existing economic activity and therefore also employment within existing water spaces and the network of water spaces, in particular ensuring the continuation of water transport activities. However, these policies largely set out safeguards for existing water space uses rather than encouraging economic growth or new employment within them; therefore there is no significant relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></p> <p>Green and water spaces can contribute to the vitality of town centres where they are located within town centres or on their fringes, resulting in the potential for a minor positive effect. .</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	+	+	+	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><u>Likely Significant Effects</u></p> <p>These policies require development proposals to protect, and enhance the provision and quality of a range of open spaces, water spaces and green corridors. In doing so this could conserve and potentially enhance townscape/neighbourhood character around open spaces, provide new or improved quality space for cultural activities, encourage location sensitive design and protect valued local views. As such these policies directly contribute to this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>Likely Significant Effects</p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks. The policies would directly contribute to this SA objective through delivering increased, enhanced and more accessible open space provision (including water spaces).</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified/</p> <p>Uncertainties</p> <p>None required.</p>	++	++	++	++	++
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p>Likely Significant Effects</p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks. This would indirectly contribute to climate change adaptation and this SA objective through reducing surface run-off and climate related flood risk from new development proposals.</p> <p>Policy D.OWS4 requires development to demonstrate that it will not contribute to flood risk.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	+	++	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks. In addition Policies S.OWS2, D.OWS3 and D.OWS4 require development proposals to enhance biodiversity. All of the policies would therefore directly contribute to this SA objective through conserving, enhancing and improving connectivity between a range of habitats, facilitating biodiversity within new developments, improving access to nature and safeguarding protected species (through habitat protection and enhancement).</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><u>Likely Significant Effects</u></p> <p>Policy S.OWS1 and Policy D.OWS3 require development proposals to protect, develop and enhance the quality of a range of open spaces and green corridors. This would directly help to improve soil quality and indirectly could help to improve air quality (through the aerobic effects of additional hedge and tree planting), resulting in a positive effect on this SA objective. In addition the support for the temporary greening of vacant land within Policy D.OWS3 would improve the appearance of the Borough and could stimulate interest in either bringing the land back into economically productive use or long term use for community benefit; thereby optimising resource usage and contributing to this SA objective.</p> <p>Policy S.OWS2 and D.OWS4 include the requirement to enhance the ecological and biodiversity value of water and will therefore make a significant positive contribution to the achievement of this objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None required.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><u>Likely Significant Effects</u></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks. This would indirectly contribute to this SA objective through reducing surface run-off and flood risk from new development proposals.</p> <p>Policy D.OWS4 requires development proposals in or adjacent to the borough's water spaces it will not increase in flood risk. This would directly contribute to this SA objective through reducing the exposure of new developments to fluvial flood risks.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	+	+	++	+
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><u>Likely Significant Effects</u></p> <p>As set out in relation to SA objective 14, the protection, development and enhancement of open spaces required by S.OWS1 and Policy D.OWS3 would help to improve soil quality, whilst the support provided by D.OWS4 for temporary greening would improve the appearance and longer term development potential of vacant and brownfield sites. As such these policies would directly contribute to this SA objective.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	~	++	~	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5: Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policy D.ES3 require all developments to protect and enhance the natural environment, and Policy S.ES1 specifically identifies the need to improve opportunities to experience nature, in particular in deficient areas. This could prioritise environmental improvements in deprived areas (or areas lacking open spaces) and increase access to environmental assets (e.g. open spaces) for a range of demographic groups, which would help to tackle social exclusion and promote social cohesion and integration. As such the policy makes a significant positive contribution to this SA objective.</p> <p>Policy D.ES2 requires all development proposals to meet or exceed the 'Air Quality Neutral' standard, which ensures all neighbourhoods receive the same minimum treatment when considering air quality issues, regardless of their social or demographic characteristics. This could prevent environmental justice related concerns from arising, resulting in an indirect positive effect on this SA objective.</p> <p>Criterion 3b of Policy D.ES7 and the supporting text to it identify the potential for development to support the Decentralised Energy Network (DEN). If this subsequently results in the deployment of decentralised energy systems in residential developments, this could reduce the exposure of future residents to market prices and enable the provision of subsidised energy for vulnerable groups. Consequently this policy has the potential to indirectly reduce fuel poverty and therefore contribute to this SA objective. Similarly, measures to address water consumption could help address water poverty, although a minor positive effect is identified in this instance.</p> <p>Policies D.ES9 and D.ES10 make a minor positive contribution as they seek to ensure that all communities enjoy a comfortable living environment.</p> <p>There is no clear relationship between policies D.ES4, D.ES5 and D.ES8 and this SA objective.</p> <p>Mitigation None identified.</p> <p>Assumptions None required.</p> <p>Uncertainties None identified.</p>	++	+	++	~	~	+	+	~	+	+	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p>Likely Significant Effects</p> <p>Policy S.ES1 identifies the need to improve opportunities to experience nature, in particular in deficient areas, as well as a requirement for all development proposals to protect and enhance the quality of the natural environment. This could result in development proposals providing new open space provision, providing improved access to and/or enhancing the quality of existing open spaces, improving the appearance of localities, and upgrading public realm, all of which would make a significant positive contribution to this SA objective.</p>	++	++	+	+	+	~	~	~	++	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>Policy D.ES2 seeks to secure air quality neutral development, contributing to a high quality public realm and reducing the impacts of pollution on the public realm, a significant positive contribution to this SA objective.</p> <p>Policy D.ES3 relates to the protection and enhancement of biodiversity and a minor positive effect in relation to liveability is identified as this will also contribute to liveable neighbourhoods.</p> <p>Policy D.ES4 sets out a pro-active approach to flood risk management which promote liveable and safe areas.</p> <p>Policy D.ES5 provides the opportunity to provide multi-functional open spaces and a minor positive effect is identified on this basis.</p> <p>Policy D.ES9 directly contributes to this SA objective through safeguarding noise sensitive receptors from adverse noise impacts resulting from development proposals. A significant positive effect is therefore anticipated.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>											
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p>Likely Significant Effects</p> <p>Policy S.ES1 identifies the need through biodiversity protection and enhancement to improve opportunities to experience nature, in particular in biodiversity deficient areas, which could be beneficial to mental and physical health. It also identifies the need to mitigate the adverse effects of contaminated land on human health. The policy also requires development to contribute towards achievement of the Borough's Air Quality Action Plan. These criterion would enhance open space provision, thereby encouraging increased recreational activity with associated positive health outcomes, as well as reducing existing health risks from contamination. As such the policy directly contributes to this SA objective.</p> <p>Policy D.ES2 sets out criteria to ensure that development proposals safeguard air quality and, through design, reduce exposure to air pollution. This would protect the physical health of both users of a development proposal and, in the case of developments with wider potential air quality effects, the wider public, resulting in a significant positive effect in relation to this objective.</p> <p>Policy D.ES3 sets out criteria to ensure that development proposals protect and enhance biodiversity interests. This could indirectly enhance open space provision and result in other environmental improvements with consequential indirect positive health and wellbeing impacts, including through increased</p>	++	++	++	+	+	~	~	++	++	++	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>active travel and recreational activities. As such the policy directly contributes to this SA objective.</p> <p>Policy S.ES1 and Policies D.ES4 and 5 set out a proactive approach to flood risk management which is likely to reduce flood risks and associated fears, whilst restricting development in flood risk areas that could be retained for recreational use. Therefore these policies could indirectly help to safeguard mental health and improve people's physical health and quality of life. A minor positive effect on this SA objective is identified for both D.ES4 and ES5.</p> <p>Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land and to control the storage and management of hazardous substances. These criteria seek to protect the environment, human health and general amenity from unacceptable impacts whilst enabling appropriate development proposals to proceed. Owing to the focus on protecting and enhancing human health the policy would directly contribute to this SA objective.</p> <p>Policy D.ES9 contributes to this SA objective through safeguarding noise sensitive receptors from adverse noise impacts (from development proposals), which would help to safeguard the physical and mental health and wellbeing of residents.</p> <p>Policy D.ES10 requires new development to avoid contributing to overheating which will have a significant positive effect on this objective.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None required.</p>											
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p>Likely Significant Effects</p> <p>There is no clear relationship between the Environmental Sustainability policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	~	~	~	~	~	~	~	~	~	0	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport,	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policy D.ES2 will contribute to this objective by requiring development to deliver air quality neutral development and, in the case of Policy SES1 contribute to the objectives of the Borough's Air Quality Action Plan.</p>	++	++	~	+	+	~	~	~	~	+	

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5: Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>Uncertainties</p> <p>None identified.</p>											
9. Town Centres: Promote diverse and economically thriving town centres.	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policy D.ES2 will contribute to this objective by requiring development to deliver air quality neutral development and, in the case of Policy S.ES1 contribute to the objectives of the Borough's Air Quality Action Plan. This will help maintain the attractiveness of town centres.</p> <p>Policies D.ES4 and 5 relate to flood risk and could contribute to this objective by helping to avoid flood risk in town centres.</p> <p>Policies D.ES9 and D.ES10 seek to avoid noise pollution and overheating. They will help achieve this objective by encouraging an attractive built environment that will help maintain the vitality of town centres.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	~	+	+	~	~	~	++	++	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p>Likely Significant Effects</p> <p>By ensuring that development proposals adequately mitigate predicted environmental and amenity impacts and by proactively managing flood risk, these policies would ensure that natural and cultural heritage assets, including those which contribute to landscapes/townscapes, are protected from adverse development impacts and from the damaging effects of flooding. Therefore these policies would have a minor positive effect on this SA objective.</p> <p>Policy D.ES9 and D.ES10 seeks to protect the built environment and could also contribute to this objective by protecting heritage and cultural assets and their settings and people's ability to enjoy them.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	+	+	+	+	+	+	++	++	+
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policy D.ES2 require all developments to protect and enhance the natural environment, and Spatial Policy S.ES1 specifically identifies the need to improve opportunities to experience nature, in particular in deficient areas. This could increase access to and improve the quality of open space provision, including through encouraging</p>	++	+	++	~	~	~	~	~	+	+	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5: Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>new open space provision in areas of scarcity, which would have a significant positive effect on this SA objective.</p> <p>Policy D.ES2 requires that where open space would be located in an areas of sub-standard air quality that the position and design of the open space reduces exposure of future users to air pollution resulting in a positive effect on this SA objective.</p> <p>Policies D.ES9 and D.ES10 seek to avoid noise pollution and overheating. They will help achieve this objective by encouraging an attractive built environment that will help maintain the quality of existing open spaces.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>											
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p>Likely Significant Effects</p> <p>These policies directly contribute to this SA objective through encouraging sustainable design, construction and use of new developments to reduce greenhouse gas emissions and adapt to climate change. In particular the policies seek to maximise energy efficiency, promote onsite energy generation from renewable energy sources, enable district heating, reduce water consumption, reduce flood risks and avoid overheating, which is likely to increase resilience and reduce vulnerability to climate change impacts.</p> <p>There is no relationship between this objective and policy D.ES9.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	++	++	++	++	++	++	++	++	~	++	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policy D.ES3 require all developments to protect and enhance biodiversity, and in doing so Policy S.ES1 requires developments to increase access to nature and to contribute to meeting the objectives of the latest Tower Hamlets Biodiversity Action Plan and the Thames River Basin Management Plan. The policies would ensure that development proposals protect, conserve and enhance a variety of habitats, designated sites, and protected species, and could also indirectly encourage greater habitat</p>	++	+	++	+	+	+	+	+	~	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>connectivity, resulting in major positive effects on this SA objective.</p> <p>Other Environmental Sustainability policies provide the opportunity to protect and where possible enhance environmental, including biodiversity, interests and amenity, resulting in indirect positive effects on this SA objective, for example D.ES5 relating to sustainable drainage could provide biodiversity benefits, depending on the methods used in a particular development.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>											
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p>Likely Significant Effects</p> <p>All policies make a significant contribution to the achievement of this objective. Specifically:</p> <p>Policies S,ES1 and D.ES2 set out criteria to ensure that development proposals safeguard air quality and, through design, reduce exposure to air pollution.</p> <p>Policies S,ES1 and D.ES3 require all developments to protect and enhance biodiversity, which would include protecting and improving soil resources.</p> <p>Policies S,ES1, D.ES4 and ES5 set out a pro-active approach to flood risk management, which would ensure that development proposals contribute to sustainable drainage practices and the protection of water quality.</p> <p>Policy D.ES6 requires development proposals to minimise water consumption and pressure on the combined sewer network, thereby ensuring the minimisation of water use.</p> <p>Policy D.ES7 will help reduce use of none renewable resources associated with energy generation.</p> <p>Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land subject in order to safeguard environmental and amenity interests. This provides a framework to allow the appropriate redevelopment of brownfield land.</p> <p>There is not relationship between Policies D.ES9 and D.ES10.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	++	++	++	++	++	++	++	++	~	~	++
15. Flood risk reduction and management: To minimise and	<p>Likely Significant Effects</p> <p>Policy S,ES1 and Policies D.ES4 and 5 set out a pro-active approach to flood risk management, which directs</p>	++	~	~	++	++	+	~	~	~	~	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
manage the risk of flooding	<p>development away from flood risk areas and therefore minimises flood risks to people and property. Policy D.ES5 also sets out criteria to ensure surface run-off is kept within acceptable limits and encourages the use of SUDS. As such these policies directly contribute to this SA objective through requiring flood risk and drainage to be managed sustainably.</p> <p>The requirement within Policy D.ES6 for development proposals to minimise impacts on water supply and sewerage networks would indirectly contribute to this SA objective through reducing potential flood risks.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p>There is not relationship between Policies D.ES9 and D.ES10.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>											
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p>Likely Significant Effects</p> <p>Policy S.ES1 sets the context for D.ES8 on contaminated land, making a minor positive contribution to this objective.</p> <p>Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land subject in order to safeguard environmental and amenity interests. This provides a framework to allow the appropriate redevelopment of brownfield land whilst reducing human health impacts arising from existing contaminated land, and therefore makes a significant positive contribution to this SA objective.</p> <p>There is no clear relationship between these the other Environmental Sustainability policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	+	~	~	~	~	~	~	++	~	~	+

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p>Likely Significant Effects</p> <p>There is no clear relationship between the policies and this SA objective.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None required.</p> <p>Uncertainties</p> <p>None identified.</p>	~	~	~	0
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p>Likely Significant Effects</p> <p>S.MW1 will contribute to this objective by safeguarding existing waste management facilities and identifying suitable areas of search for new facilities.</p> <p>D.MW2 includes criteria to protect the amenity of existing uses where new waste facilities are proposed and a significant positive effect is identified.</p> <p>Policy D.MW3 will contribute to liveable neighbourhoods by ensuring that adequate waste management is in place at the development level and a minor positive effect is identified.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	++	+	+
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p>Likely Significant Effects</p> <p>Policy S.MW1 safeguards existing sites for waste recycling and treatment capacity and identifies sites for new facilities, providing the basis for avoiding development proposals that would prejudice these uses and any associated health impacts.</p> <p>Policy D.MW2 identifies the need for new waste management proposals to be enclosed and to consider impacts on amenity, including emissions to air resulting in a positive effect.</p> <p>Policy D.MW3 will contribute to this objective by ensuring that provisions for managing waste are incorporated in developments.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None required.</p>	+	+	+	+
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p>Likely Significant Effects</p> <p>There is no clear relationship between the policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	~	~	~	0

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p>Likely Significant Effects</p> <p>Policy D.MW2 seeks to ensure that new waste management facilities do not result in adverse transport impacts, resulting in a minor positive effect against this objective.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	~	+	~	0
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p>Likely Significant Effects</p> <p>There is no clear relationship between these policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	~	~	~	0
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p>Likely Significant Effects</p> <p>S.MW1 seeks to safeguard existing waste management facilities and identifies areas of search for new ones this could contribute to employment in the Borough in the waste management sector resulting in a minor indirect effect.</p> <p>There is no clear relationship between the other policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	~	~	0
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p>Likely Significant Effects</p> <p>Policies S.MW1, D.MW2 and D.MW3 could contribute to employment in the Borough in the waste management sector resulting in an indirect positive effect on this objective. .</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	+	+
9. Town Centres: Promote diverse and economically thriving town centres.	<p>Likely Significant Effects</p> <p>There is no clear relationship between the policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p>	~	~	~	0

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
	<p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>				
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p>Likely Significant Effects By directing waste management facilities to appropriate sites and ensuring that development proposals adequately mitigate predicted environmental and amenity impacts these policies would ensure that natural and cultural heritage assets, including those which contribute to landscapes/townscapes, are protected from adverse development impacts. Therefore these policies would have a minor positive effect on this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	+	+	+	+
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>Likely Significant Effects There is no clear relationship between the policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	~	~	~	0
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p>Likely Significant Effects These policies directly contribute to this SA objective by encouraging measures to minimise carbon emissions and maximise the use of lower carbon energy sources, the minimisation of waste generation, enabling waste segregation and recycling. A significant positive effect is anticipated.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	++	++	++	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p>Likely Significant Effects Policies S.MW1, D.MW2 and D.MW3 make a positive contribution to this objective by seeking to manage the environmental impacts of managing waste, including transport related factors that could impact on biodiversity.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	+	+	~	+

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p>Likely Significant Effects</p> <p>Policies S.MW1, D.MW2 and D.MW3 set out a strategy and development management criteria to provide waste management facilities, minimise residual waste generation from new developments and manage it thereby encouraging the growth of the circular economy.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	++	++	++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p>Likely Significant Effects</p> <p>There is no clear relationship between the policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	~	~	~	0
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p>Likely Significant Effects</p> <p>There is no clear relationship between the other policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	~	~	~	0

<p>Cabinet</p> <p>16 December 2020</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Ann Sutcliffe, Corporate Director, Place</p>	<p>Classification: Unrestricted</p>
<p>Spitalfields Neighbourhood Plan – Validation of Submission</p>	

Lead Member	Councillor Eve McQuillan, Cabinet Member for Planning and Social Inclusion
Originating Officer(s)	Steven Heywood, Plan-Making Officer
Wards affected	Spitalfields & Banglatown; Weavers
Key Decision?	Yes
Forward Plan Notice Published	17 November 2020
Reason for Key Decision	Significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the relevant local authority
Strategic Plan Priority / Outcome	<p>1. People are aspirational, independent and have equal access to opportunities;</p> <p>2. A borough that our residents are proud of and love to live in</p>

Executive Summary

The Spitalfields Neighbourhood Plan was formally submitted for consideration by the Council on 30 October 2020. The Council is now required to assess the submission against the statutory requirements for neighbourhood plan submissions, and decide whether the plan should be put forward for further consultation and examination. The Council is not required at this stage to make an assessment of the suitability of the plan for adoption by the Council.

Recommendations:

The Cabinet is recommended to:

1. Approve the Spitalfields Neighbourhood Plan to be submitted for examination, on the basis that it is compliant with the necessary regulations under the Neighbourhood Planning (General) regulations 2012.
2. Authorise the Divisional Director of Planning and Building Control, in

consultation with the Cabinet Member for Planning and Social Inclusion, to provide comments on behalf of the Council on the submission version of the neighbourhood plan during the Regulation 16 publicity period.

3. Agree that the Council should proceed to appoint an examiner of the neighbourhood plan with the consent of the Spitalfields Neighbourhood Forum.
4. Note the Equalities Impact Assessment considerations as set out in Paragraphs 7.1 and 7.2.

1. REASONS FOR THE DECISIONS

- 1.1 Tower Hamlets Council has received a submission of a draft Spitalfields Neighbourhood Plan under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 ('the 2012 Regulations').
- 1.2 The Council is required to consider whether the submission of the neighbourhood plan meets the legal requirements for such plans under Schedule 10 of the Localism Act 2011. If the submission meets those requirements, the neighbourhood plan should be taken forward to formal consultation and examination.
- 1.3 Officers have assessed the submission against the relevant legislation and regulations and are satisfied that the Spitalfields Neighbourhood Plan as submitted meets the requirements to proceed to consultation and examination. This is the reason for recommendation 1 above.
- 1.4 Under Regulation 16 of the 2012 Regulations, the Council must publicise and consult on the submission documents 'as soon as possible' after receiving them (assuming they meet the requirements of the legislation).
- 1.5 The Council organises the consultation under Regulation 16, but is also able to respond to that consultation as an interested party. An adopted neighbourhood plan will form part of the Council's development plan and will have full weight in decision making on planning matters in the neighbourhood plan area. This is the reason for recommendation 2 above.
- 1.6 Schedule 10 of the Localism Act 2011 requires an independent examiner of the neighbourhood plan to be appointed, who will examine the plan following the Regulation 16 consultation. This person should be appointed with the consent of the neighbourhood forum. This is the reason for recommendation 3 above.

2. ALTERNATIVE OPTIONS

- 2.1 The Council may decline to consider a neighbourhood plan submission if it is considered a repeat submission; or can decline to take forward a neighbourhood plan if it considered not to meet the legislative requirements. If the neighbourhood plan submission meets the legislative requirements and does not meet the definition of a repeat proposal, it must be taken forward.
- 2.2 Officers consider that the submission meets the legislative requirements, and it is the first submission of a Spitalfields Neighbourhood Plan and cannot be considered a repeat proposal, and therefore must be taken forward to consultation and examination. Consequently, there is no alternative option provided.

3. DETAILS OF THE REPORT

- 3.1 This report provides an overview of the assessment of the Spitalfields Neighbourhood Plan submission.
- 3.2 The content of this report is as follows:
 - Section 4: provides an introduction to Neighbourhood Planning
 - Section 5: outlines the relevant legislative framework and guidance
 - Section 6: provides an assessment of the Spitalfields Neighbourhood Plan submission

4. INTRODUCTION TO NEIGHBOURHOOD PLANNING: A COMMUNITY-LED PROCESS

- 4.1. The Localism Act 2011 amended the Town and Country Planning Act (TCPA) 1990 to make provision for neighbourhood planning, which gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.
- 4.2. The legislative provisions concerning neighbourhood planning within the TCPA 1990 are supplemented by the Neighbourhood Planning (General) Regulations 2012 (as amended by the Neighbourhood Planning (General) (Amendment) Regulations 2015) and the Neighbourhood Planning (Referendum) Regulations 2012.
- 4.3. Neighbourhood planning provides communities with the ability to prepare a Neighbourhood Development Plan (NDP) and/or Neighbourhood Development Order (NDO), in areas designated by the LPA on application as a neighbourhood area. Neighbourhood planning powers may only be exercised by bodies authorised by the legislation. In a neighbourhood area

where there is a parish council, only a parish council may make proposals for a NDP or NDO. In neighbourhood areas without a parish council, only a body designated by the LPA as a neighbourhood forum may bring forward proposals for that neighbourhood area.

- 4.4. NDPs set out policies in relation to the development and use of land in all or part of a defined neighbourhood area and may include site allocations, or development principles, for allocated sites. They may also include character appraisals and seek to establish community facilities and/or identify areas for public realm improvements. NDOs allow for planning permission to be granted in the circumstances specified and exempt certain types of development, or development in certain areas, or on particular sites, from the usual requirement to apply to the LPA for a grant of planning permission.
- 4.5. Both NDPs and NDOs need to be in general conformity with the strategic policies of the Council's Development Plan: the Tower Hamlets Local Plan (2020) and the London Plan (2016).
- 4.6. An NDP that has been 'made' in accordance with the relevant legislative provisions forms part of the Council's statutory Development Plan (comprising the Local Plan and London Plan) and, as such, will be accorded full weight when determining planning applications in the neighbourhood area. NDPs will form a new spatial layer to the Council's planning policy and guidance.
- 4.7. NDP policies are developed by a neighbourhood forum through consultation with stakeholders in their relevant neighbourhood area and through engagement with Council officers. Proposed NDP policies must be supported by an up-to-date evidence base to ensure that they are reasonable, sound and justified. Before the NDP is 'made' it must be subject to pre-submission publicity and consultation, submitted to the LPA for a legal compliance check, publicised for consultation, submitted for independent examination, found by the independent examiner to meet the basic conditions specified in the legislation, and passed at a referendum. Following the Neighbourhood Planning Act 2016, an NDP must be given some weight in determining planning applications once it has passed examination – even before it has passed at a referendum.

Community Infrastructure Levy

- 4.8. The Community Infrastructure Levy Regulations 2010, as amended by the Community Infrastructure Levy (Amendment) Regulations 2013 ('the CIL Regulations') were supplemented by the Community Infrastructure Levy Guidance Note, published by DCLG on 26 April 2013. The 2013 guidance was replaced by the Government's PPG on 6 March 2014.
- 4.9. The CIL Regulations, as explained by the Planning Practice Guidance (PPG), make provision for how CIL receipts may be used in relation to neighbourhood planning in those areas which have Parish Councils and those which do not. Tower Hamlets currently does not have any Parish Councils and, as such, the Council retains the revenue generated by CIL. A community governance

review was held in 2019 to determine whether a parish council should be established for the Spitalfields area. On 17 July 2019, the Council agreed that there should be no change to existing community governance arrangements.

- 4.10. The Community Infrastructure Levy PPG states (at paragraph 145) that in areas where there is a 'made' NDP or NDO in place, 25% of CIL collected in the neighbourhood area should be spent in that area. Where there is a parish council in place, the money should be passed to the parish council for them to spend directly. Paragraph 146 states that "if there is no parish or town council, the charging authority will retain the levy receipts but should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding".
- 4.11. Therefore, where an NDP or NDO has been adopted, the Council is required to consult with the local community as to how this 25% proportion of CIL receipts will be spent. Irrespective of this regulation, the Cabinet in December 2016, agreed to undertake this for all areas of the borough whether or not an NDP or NDO has been adopted.

5. NEIGHBOURHOOD DEVELOPMENT PLANS: RELEVANT LEGISLATION AND GUIDANCE

- 5.1. This section outlines the relevant legislative framework and guidance as they relate to the submission and consideration of NDPs.

Submitting the Neighbourhood Development Plan

- 5.2. In accordance with Regulation 15 of the 2012 Regulations where a relevant body submits a NDP to the LPA it must include:
- (a) the proposed Neighbourhood Development Plan;
 - (b) a map or statement which identifies the area covered by the Neighbourhood Plan;
 - (c) a Consultation Statement that contains details of who was consulted on the draft Neighbourhood Plan, how they were consulted, the main issues and concerns raised, and how these have been addressed in the Neighbourhood Plan;
 - (d) a Basic Conditions Statement that sets out how a Neighbourhood Plan or Neighbourhood Development Order meets the 'basic conditions'. These being:
 - i. it has regard to national policies and advice;
 - ii. it has special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses (only applicable to Neighbourhood Development Orders that grant planning permission for development);
 - iii. it has special regard to the desirability of preserving or enhancing the character or appearance of any conservation

- area (only applicable to Neighbourhood Development Orders that grant planning permission for development);
 - iv. it contributes to the achievement of sustainable development;
 - v. it is in general conformity with the strategic policies contained in the development plan for the area of the authority; and
 - vi. and that the making of the order does not breach, and is otherwise compatible with, EU obligations. And,
- (e) where appropriate, the information to enable appropriate environmental assessments if required.

5.3. An LPA may decline to consider a plan proposal if they consider it to be a repeat proposal (TCPA 1990 Schedule 4B Paragraph 5). If an LPA declines to consider a plan on this basis it must inform the forum of this decision.

Considering the submission

5.4. In accordance with the TCPA 1990 Schedule 4B Paragraph 6 and Planning and Compulsory Purchase Act (PCPA) 2004 Schedule 38B, Paragraphs 1, 2 and 4, the LPA must consider the following:

- (a) whether the neighbourhood forum is authorised to act;
- (b) whether the proposal and accompanying documents:
 - i. comply with the rules for submission to the LPA (see 5.2 above); and
 - ii. meet the 'definition of an NDP': "A plan which sets out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan"; and
 - iii. meet the 'scope of NDP provisions':
 - 1. The NDP must specify the period for which it is to have effect; and
 - 2. It cannot include provision about development that is 'excluded development' (as defined by paragraph 61K of schedule 9 of the TCPA 1990) such as minerals and waste matters or Nationally Significant Infrastructure Projects; and
 - 3. It cannot relate to more than one neighbourhood area and there are no other NDPs in place that cover any part of the neighbourhood area.
- (c) whether the neighbourhood forum has undertaken the correct procedures in relation to consultation and publicity (outlined in Regulation 14 of the 2012 Regulations). These state that before submission to the LPA the qualifying body should:
 - i. publicise (but this does not have to be on a website) in a way that is likely to bring to the attention of people who live work or carry on business in the area details of :
 - 1. the proposals,
 - 2. when and where they can be inspected,
 - 3. how to make representations, and

4. the deadline for making representations – not less than 6 weeks from when they were first publicised
 - ii. consult any consultation body listed in The Neighbourhood Planning (General) Regulations 2012 Schedule 1 whose interests they consider may be affected by the proposals for a NDP; and
 - iii. send a copy of the NDP to the LPA.
- 5.5. In accordance with paragraph 6 of schedule 4B of the TCPA 1990, the LPA can refuse to take forward a plan proposal if any of the criteria above do not apply.
- 5.6. The LPA must notify the forum whether or not they are satisfied that the proposal complies with the criteria for a NDP. Where it is not satisfied the LPA can refuse and must notify them of the reasons. It must also publicise its decision in a 'decision notice' (Regulation 19 of the 2012 Regulations).
- 5.7. The legislation and regulations are clear that when a draft NDP is submitted to a LPA the authority is only considering the draft plan against the statutory requirements set out in paragraph 6 of Schedule 4B of the TCPA 1990. In particular, the LPA has to be satisfied that a basic condition statement has been submitted but it is not required to consider whether the draft plan meets the basic conditions. It is only after the independent examination has taken place and after the examiner's report has been received that the LPA comes to its formal view on whether the draft NDP meets the basic conditions (Neighbourhood Planning PPG Paragraph 053).

6. NEIGHBOURHOOD DEVELOPMENT PLANS: SPITALFIELDS NEIGHBOURHOOD PLAN SUBMISSION

- 6.1. This section provides detailed of the assessment of the Spitalfields Neighbourhood Plan submission, in relation to the criteria outlined above.

Submission of the Neighbourhood Development Plan

- 6.2. The Spitalfields Neighbourhood Forum submitted the required documents to the Council on 30 October 2020.
- 6.3. The required documents are attached as appendices to this report. Further evidence base documents were submitted and will be provided to the examiner of the plan – they are not statutory requirements for the submission, so have not been attached as appendices to this report. The full list of attached documents is as follows:
 - Spitalfields Neighbourhood Plan (Appendix 1)
 - Consultation Statement and Appendices (Appendices 2-4)
 - Basic Conditions Statement (Appendix 5)

Assessment of the Submission

- 6.4. This section summarises the assessment of the submission against the requirements set out in the legislation and regulations, as described above.

In accordance with TCPA 1990 Schedule 4B Paragraph 6 and PCPA 2004 Schedule 38B, Paragraphs 1, 2 and 4, is the neighbourhood forum authorised to act?

- 6.5. Yes. The Spitalfields Neighbourhood Area and Neighbourhood Forum were designated by Tower Hamlets Council on 5 April 2016. The designation process followed the required statutory procedures and as such the neighbourhood forum is authorised to act.

In accordance with TCPA 1990 Schedule 4B Paragraph 6 and PCPA 2004 Schedule 38B, Paragraphs 1, 2 and 4, did the proposal and accompanying documents comply with the rules for submission to the LPA (see 5.2 above)?

- 6.6. Yes. The documents received on 30 October 2020 included all the necessary documents to comply with the submission requirements:

- The submission version of the neighbourhood plan;
- a map of the area the plan relates to (within the plan itself);
- a consultation statement which records who was consulted, how they were consulted, a summary of responses received, and an explanation of how those responses were taken into account in the preparation of the submission version of the plan;
- a basic conditions statement which covers the issues required, and which makes clear that the Council's Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report found that an SEA or HRA are not required.

In accordance with TCPA 1990 Schedule 4B Paragraph 6 and PCPA 2004 Schedule 38B, Paragraphs 1, 2 and 4, did the submitted draft NDP meet the 'definition of an NDP'?

- 6.7. Yes. An NDP is defined as "a plan which sets out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan" (PCPA 2004 (as amended)). The policies within the neighbourhood plan relate to heritage protection, open space, and the delivery of employment space in new developments, and officers believe that they are policies for the development and use of land.

In accordance with TCPA 1990 Schedule 4B Paragraph 6 and PCPA 2004 Schedule 38B, Paragraphs 1, 2 and 4, did the submitted documents meet the 'scope of NDP provisions'?

- 6.8. Yes. The plan meets the scope of NDP provisions. The plan period of 2020–2035 is specified in the submitted Neighbourhood Plan and in the Basic Conditions Statement. The Plan does not include provision regarding ‘excluded development’. The Plan relates only to one neighbourhood area (the Spitalfields Neighbourhood Area) as designated and there are no other NDPs in place for that area.

In accordance with TCPA 1990 Schedule 4B Paragraph 6 and PCPA 2004 Schedule 38B, Paragraphs 1, 2 and 4, whether the neighbourhood forum has undertaken the correct procedures in relation to consultation and publicity?

- 6.9. Yes. The Spitalfields Neighbourhood Forum ran a public consultation between 20 July and 14 September 2020. This extended beyond the required six-week consultation period. Due to the coronavirus pandemic, no public events could be held during the consultation period, but leaflets announcing the consultation were hand-delivered to every address within the neighbourhood area, an online survey was conducted via the forum’s email lists, and the statutory consultees were contacted. A copy of the neighbourhood plan was made available on the forum’s website, and a copy was sent to the Council along with an announcement that the consultation would be taking place. Details of the consultation activities (including activities undertaken at earlier stages of the neighbourhood plan development process) can be found in Appendices 2-4.

Conclusion

- 6.10. As outlined above, the submission of the Spitalfields Neighbourhood Plan is considered to comply with the relevant criteria and the plan should therefore proceed to consultation and examination.
- 6.11. It is not the Council’s role at this stage to assess compliance of the neighbourhood plan with the basic conditions – at this point, the Council can only assess whether the Forum has provided a statement setting out their own assessment of how the plan meets the basic conditions. The Regulation 16 consultation period, held before the examination of the plan, provides an opportunity for the Council and other stakeholders to make representations on the plan, including how it complied with the basic conditions.

Next Steps

- 6.12. If Cabinet approves the recommendations of this report, the Council will be responsible for arranging an independent examination of the neighbourhood plan, and for publicising the plan and inviting representations on it.
- 6.13. The consultation period will be six weeks, and is expected to run between 7 January and 18 February 2021, after the call-in period for this decision has expired and the holiday period has passed. The plan will be made available on the Council’s website. Depending on regulations and guidance relating to the coronavirus pandemic, hard copies may also be made available at the Town Hall reception and in the closest Idea Store to the neighbourhood area,

at Whitechapel. A public notice will be placed in a local newspaper, and an email will be sent to the planning policy database, to any other consultee referred to in the submitted consultation statement, and to the list of respondents to the Regulation 14 consultation which the Forum has provided to the Council as part of the submission.

- 6.14. The examiner of the neighbourhood plan will be appointed by the Council, with the consent of the Forum. The Council will cover the costs of the examination, and will provide the examiner with all the submitted documents and any representations received during the consultation period. The examination is expected to begin immediately after the consultation period ends. It is expected that the examination will be based on written representations, without the need for a public hearing, in line with paragraph 056 of the government's Neighbourhood Planning Guidance. However, this is at the examiner's discretion.

7. EQUALITIES IMPLICATIONS

- 7.1. Officers have used the Council's Equality Impact Assessment Screening tool to consider impacts on people with the protected characteristics outlined in the Equalities Act 2010 (Appendix 6). It is considered that the proposals in this report do not have any adverse effects on people who share the protected characteristics and no further action is required at this stage.

8. OTHER STATUTORY IMPLICATIONS

- 8.1. This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
 - Consultations,
 - Environmental (including air quality),
 - Risk Management,
 - Crime Reduction,
 - Safeguarding.
- 8.2. Best Value Implications: During the determination of the submission the Council has worked with the Spitalfields Neighbourhood Forum where appropriate, and in line with our neighbourhood planning guidance, having regard to economy, efficiency, and effectiveness, and in conformity with the statutory requirements as detailed in the relevant legislation.
- 8.3. Consultations: See paragraph 6.9 above, and Appendices 2-4.
- 8.4. Environmental Implications: There is a statutory requirement to determine whether neighbourhood plans require a Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA), and for such assessments

to be undertaken if necessary. The Council undertook an SEA/HRA screening of the draft neighbourhood plan before submission, and concluded that neither an SEA nor an HRA is required. This decision was published by the Council on 12 October 2020, and is provided as Appendix 7.

9. COMMENTS OF THE CHIEF FINANCE OFFICER

- 9.1. There are no material financial implications emanating from this report which recommends taking forward the Spitalfields local plan to the next stage of consultation and examination. Costs will be incurred obtaining an independent examination and from any appeals. These costs are anticipated to be less than £10k and will be managed from within the existing budgetary provision.
- 9.2. There are likely to be financial implications if the local plan is formally adopted, for example the use of CIL monies. These implications will be reflected in the MTFs should the local plan pass consultation and examination.

10. COMMENTS OF LEGAL SERVICES

- 10.1. This report seeks the Cabinet to approve the Spitalfields Neighbourhood Plan to be submitted for examination, on the basis that it is compliant with the Neighbourhood Planning General regulations 2012. Further, Cabinet is asked to Authorise the Divisional Director of Planning and Building Control, in consultation with the Cabinet Member for Planning and Social Inclusion, to provide comments on behalf of the Council on the submission version of the neighbourhood plan during the Regulation 16 publicity period. Cabinet is also required to Agree that the Council should proceed to appoint an independent examiner of the neighbourhood plan and consider the Equalities Impact assessment in doing so.
- 10.2. Pursuant to section 9D of the Local Government Act 2000 all functions of an authority are executive functions unless they are specified as not in either the 2000 Act or the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended). The decision on whether a neighbourhood development plan meets the statutory requirements and should proceed to referendum is not a specified function and is decision for the Executive. The Executive is also authorised to consider the proposed recommendations in this report by virtue of the Spitalfields Neighbourhood Plan comprising a 'Key Decision' as defined in Section 3 of the Council's Constitution. Paragraph 6 of Section 3 of the Constitution defines 'Key Decision' as an executive decision which is likely to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions. As stated above in this report, this Neighbourhood Plan if implemented will have a significant effect on the wards that lie within the boundary of the identified neighbourhood area as it will comprise a material planning consideration in the assessment of new planning applications within this area.

- 10.3. Section 116 of the Localism Act 2011 makes provision for local communities to bring forward planning proposals at a local level. That Act (which amended the TCPA 1990 to make provision for neighbourhood planning), the PCPA 2004 and the subsequent 2012 Regulations confer specific functions on the Council relation to neighbourhood planning.
- 10.4. Together this legislation sets out what must be included with the submission of a NDP, and the matters which the Council must consider in reaching a view on whether the NDP should proceed to publication. A thorough analysis of the draft NDP's compliance with each requirement is set out in paragraph 6 of this report. It is considered that the proposed plan is in line with the relevant criteria and the that plan should therefore proceed to publication and examination (See paragraph 6.10).
- 10.6. Following regulation 16 publication the Council must, with the consent of Spitalfields Neighbourhood forum, appoint an independent examiner in accordance with Paragraph 7 of Schedule 4B of the TCPA 1990. The examiner must consider whether the NDP meets the requirements as set out in legislation and produce a report recommending whether NDP should go to a referendum.
- 10.7. Once the Council has received the Examiner's report, it must consider the recommendations, take a view on whether the basic conditions are satisfied, and what action to take in response to the recommendations. If the NDP passes examination the Council must arrange a referendum.
- 10.8. If ratified at referendum, the Council must publicise the plan and bring it in to force. If made, the NDP will become a statutory plan carrying equal weight to the Local plan which means that it will form part of the key planning policy against which planning applications and permissions in principle will be assessed.
- 10.9. When making decisions on an NDP the Council must have due regard to the need to achieve objectives set out under s149 of the Equality Act 2010 to eliminate conduct that is prohibited by the act, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and persons who do not share it, which is also known as the Public sector equality duty.
- 10.10. An Equality Impact Assessment (EQIA) (see Appendix 6) has been undertaken in respect of the proposed NDP and it is considered that the plan does not have any adverse effects and no further action is required at this stage. Members must consider the EQIA when reaching a decision.

Linked Reports, Appendices and Background Documents

Linked Report

- N/A

Appendices

- Appendix 1: Spitalfields Neighbourhood Plan
- Appendix 2: Consultation Statement (including appendices B and D)
- Appendix 3: Consultation Statement Appendix A – Consultation Report by Gracechurch Consulting
- Appendix 4: Consultation Statement Appendix C – Commonplace Survey and Data
- Appendix 5: Basic Conditions Statement
- Appendix 6: Equalities Impact Assessment Screening
- Appendix 7: SEA/HRA Screening Determination Letter

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

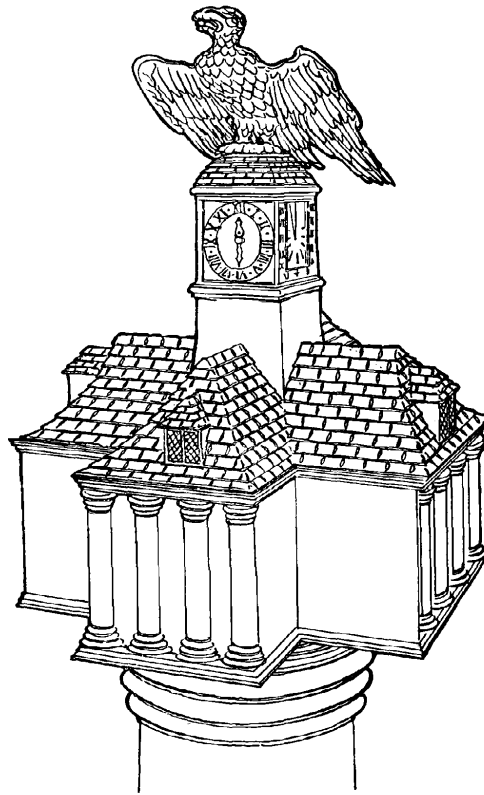
- NONE

Officer contact details for documents:

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Spitalfields Neighbourhood Planning Forum



Spitalfields Neighbourhood Plan 2020-2035

Submission (Regulation 16) Version

October 2020

CONTENTS

CHAIRMAN’S FOREWORD	2
1 INTRODUCTION	4
Purpose of the plan	4
Policy context.....	4
Monitoring the Plan.....	6
2 LOCAL CONTEXT	7
History of Spitalfields.....	7
Spitalfields today	8
3 VISION AND OBJECTIVES	12
Vision for Spitalfields	12
Objectives	12
4 URBAN HERITAGE.....	15
Protecting the physical fabric of Spitalfields	17
Land use, activities and frontages	22
Public realm	23
Heritage projects	24
5 OPEN SPACES AND ENVIRONMENT	26
Facilitating urban greening.....	26
Local Green Spaces	30
Ram & Magpie site.....	32
Urban greening projects.....	35
6 COMMERCIAL MIX	37
7 COMMUNITY INFRASTRUCTURE LEVY PRIORITIES	40
8 POLICIES MAP	41
APPENDIX A	LOCAL CHARACTER AREA APPRAISALS
APPENDIX B	NON-DESIGNATED HERITAGE ASSETS
APPENDIX C	LOCAL GREEN SPACES
APPENDIX D	ASSETS OF HISTORICAL INTEREST

CHAIRMAN'S FOREWORD

Those of us who volunteered in 2014 to set up an Interim Steering Group to help local resident groups to produce this Neighbourhood Plan did so because we felt great affection for this area and were concerned for its future, whether we work here or have chosen to live here because of its unique mixture of qualities.

As we started to think about the Neighbourhood Plan process, we could see that the mix of its rich history and its diverse urban pressures were both the reason for the area being so fascinating, and also presented major complexities to the Neighbourhood Plan being able to deliver tangible benefits to our residential communities as well as finding ways to support business enterprise and increase commerce in this bustling business neighbourhood area.

In April 2016 the London Borough of Tower Hamlets designated the neighbourhood area as a business neighbourhood area and approved the neighbourhood forum. Fortunately for the forum a significant number of residents, businesses and local stakeholders took part in our public consultations between 2017 and 2020 across our very diverse community. Alongside this, a number of local organisations and individuals with specialist expertise helped us analyse our survey data, to develop our vision, aims and objectives, and have provided us with a robust foundation for this plan.

Several local factors have confirmed the importance of having a plan in place. The implications of poor air quality and development pressures on public realm and green spaces, the need to strengthen the protection given to our built heritage and make policy in this area more dynamic, and the impact of the Coronavirus pandemic, particularly on small and independent businesses, have started to impact on resident's and our commercial life more severely of late. This plan highly commends the bold and ambitious policies contained in the Tower Hamlets Local Plan designed to meet the housing needs of our ever-growing population. Under national policy, neighbourhood plans become an integral part of the overall development plan for the area and once adopted allow a real ground level influence on defining what development is needed and what gets built. So now is the right time for our policies to help shape land use, conservation, infrastructure spending priorities and the business environment for the next fifteen years and lay the foundations for the longer term.

Readers should remember that the policies in a plan of this nature will not automatically generate the types of developments we support or prevent the types of developments we oppose. However, they will provide a clearer guide for the local authorities, private landowners and developers about what is required locally, and what plans might be approved. They will also enable Tower Hamlets planning officers to be clearer with planning applicants about what conditions will need to be met for proposals to be acceptable.

So, this document does not provide a magic answer to long standing development problems, but it is one that will have considerable potential influence for good in some tricky areas of community life. I commend it to all readers and encourage those who are able to vote on its adoption to do so when the time comes.

I must finish by thanking the many people who have had a hand in producing the plan, and especially the small core group of volunteers who have put in so much work over a long period to make it happen.

James Frankcom

Chairman

Spitalfields Neighbourhood Planning Forum

Special thanks are due to the following people who have given their time, support and expertise over the years towards the development of this neighbourhood plan:

Tayo Abimbola
Yasmin Aktar
Chris Bowden
Toby Brown
Cllr. Shad Chowdhury
Dan Cruickshank
Melanie Denyer
David Donoghue (Chairman, 2015-2019)
Chris Dyson
Alec Forshaw
Jeremy Freedman
Charles Gledhill
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Paul Johnston (Vice Chair, 2015-2019)
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Krissie Nicolson (Vice Chair, 2019-2020)
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Saif Osmani (Vice Chair, 2019-2020)
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Michelle Sinden
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Jason Zeloof

1 INTRODUCTION

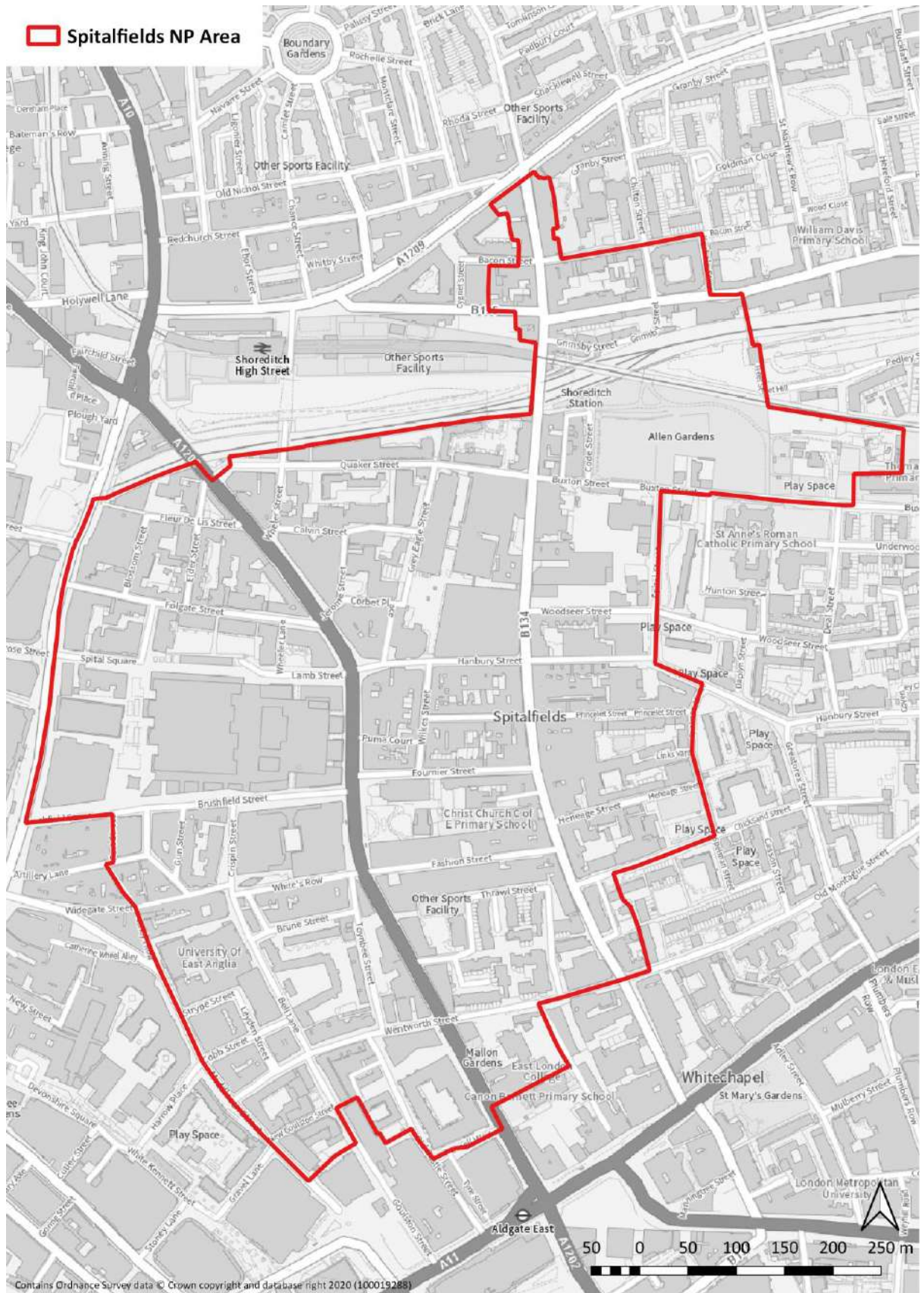
Purpose of the plan

- 1.1 This document represents the Neighbourhood Plan for Spitalfields for the period 2020-2035. The Plan contains a vision for the future of Spitalfields and sets out clear planning policies to realise this vision.
- 1.2 The principal purpose of the Neighbourhood Plan is to guide development within the Spitalfields Neighbourhood Area. It also provides guidance to anyone wishing to submit a planning application for development within the neighbourhood area. The process of producing a plan has sought to involve the community as widely as possible. The different topic areas are reflective of matters that are of considerable importance to Spitalfields, its residents, businesses and community groups.
- 1.3 Some of the Neighbourhood Plan policies are general and apply throughout the Plan area, whilst others are site or area-specific and apply only to the appropriate areas illustrated on the relevant map. Nevertheless, in considering proposals for development, Tower Hamlets Borough Council will apply all relevant policies of the Plan. It is therefore assumed that the Plan will be read as a whole, although some cross-referencing between Plan policies has been provided.
- 1.4 The process of producing the Neighbourhood Plan has identified a number of actions which have been presented separately to the policies. This is because these are not specifically related to land use matters and therefore sit outside the jurisdiction of a Neighbourhood Plan. These actions will be addressed by the Neighbourhood Forum outside of the Neighbourhood Plan process.

Policy context

- 1.5 The Neighbourhood Plan represents one part of the development plan for the neighbourhood area over the period 2020-2035, the others being the Tower Hamlets Local Plan and the London Plan. The National Planning Policy Framework is also a material consideration.
- 1.6 Tower Hamlets Borough Council, as the local planning authority, designated the Spitalfields Neighbourhood Area in April 2016 to enable the Spitalfields Neighbourhood Forum to prepare the Neighbourhood Plan. This is a business Neighbourhood Plan, reflecting the fact that business and related matters are considered to be the priority matters to be addressed through planning policy at the neighbourhood scale.
- 1.7 The Neighbourhood Plan has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Planning Regulations 2012 (which were amended in 2015). The Neighbourhood Forum has prepared the plan to establish a vision for the future of the area and to set out how that vision will be realised through the planning of land use and development change over the plan period.
- 1.8 The map in Figure 1.1 below shows the boundary of the Neighbourhood Plan area. This covers part of Spitalfields and Banglatown ward.

Figure 1.1: Spitalfields neighbourhood plan area



- 1.9 The Neighbourhood Plan has a number of appendices, with two of these – Appendix A on Local Character Area Appraisals and Appendix B on Non-Designated Heritage Assets - directly informing and containing detail relevant to Policy SPITAL1, and which should be read in conjunction with that Policy SPITAL1.
- 1.10 Appendix C is part of the evidence base that has informed the designation of the Local Green Spaces in Policy SPITAL5 but does not affect how the policy should be applied. Appendix D is for information and does not explicitly relate to any of the policies.

Monitoring the Plan

- 1.11 Spitalfields Neighbourhood Planning Forum, as the responsible body, will be responsible for monitoring the effectiveness and delivery of the plan. and periodically reviewing it to ensure its continued relevance.

2 LOCAL CONTEXT

History of Spitalfields

“Spitalfields is the oldest industrial suburb in London. it was already densely peopled and “almost entirely built over,” in 1701 when Lambeth was still a marsh, Fulham a market garden and Tottenham Court Rd a green. it owes its origins to those refugee traditions which, in defiance of the Elizabethan building regulations, and to escape the restrictions of the city guilds, settled in Bishopsgate Without and the Liberty of Norton Folgate. Spitalfields is a junction between, on the one hand, a settled, indigenous population, and on the other, wave upon wave of newcomer.” Raphael Samuel, 22nd July 1988¹

- 2.1 Spitalfields is a neighbourhood which sits just outside the ancient and long since removed walls of the historic City of London.
- 2.2 A recent archaeological excavation revealed an important Roman sarcophagus whose lead lining with its rich scallop shell decorations contained the remains of a petite Roman woman who had lain undisturbed for over a thousand years, She was dug up to make way for the kind of urban redevelopment that have sprung up across London and especially Tower Hamlets in the last twenty years. The recovery of ten well-preserved Roman burials and extensive evidence of the early urbanisation of Spitalfields during building works in Cobb Street in 2020 suggests that much more may yet be discovered.
- 2.3 The neighbourhood’s name derives from The New Hospital of St Mary without Bishopsgate founded in 1197 and which became known as St Mary’s Spital. The priory’s charnel house, circa 1320, once a store for the bones of those who died in the Great Famine of the 13th century can be glimpsed beneath the shiny glass and steel modern office block that towers above it.
- 2.4 On a field nearby, a market – the Spitalfields market – began in the 13th century, was licensed by Charles I in 1638 and moved into its current premises in the Grade II-listed Horner buildings in 1887.
- 2.5 On every street, there are layers of history.
- 2.6 Civil War defences ran through the area, approximately along the line of Brick Lane. Diarist Samuel Pepys visited the Old Artillery Ground in Spitalfields in 1669 to watch the testing of new guns. Gun Street, Artillery Lane, Artillery Passage are all echoes of this land use, but it was after the Great Fire of London, in 1666, that Spitalfields became a prime site for development. Elegant rows of Georgian terraced housing sprung up in the streets around the market and the houses in Elder Street, Folgate Street, Fournier, Wilkes, Princelet and Hanbury Streets all survive to this day remarkably intact after a vigorous campaign to save them from demolition by amongst others, contemporary resident, Dan Cruickshank.
- 2.7 Many of the first occupants of these early 18th houses were Huguenots fleeing from a hostile France. They brought with them their creative artistry as silk weavers and the Spitalfields

¹ Quoted in ‘Farewell to Spitalfields’, Spitalfields Life, 2010

reputation for creativity survives to this day. The Spire of Christchurch, the Hawksmoor masterpiece consecrated in 1729, dominated the roof line, its entrance facing Westwards along Brushfield Street towards Bishopsgate, the street named after one of the seven ancient entrances to the City of London. At the other end of Fournier Street the former French Protestant church, became a synagogue, when Jewish immigrants fleeing pogroms in Eastern Europe settled in the area. The building is now a mosque where the Bangladeshi community, who settled in the area in the later part of the 20th century, worship. The electoral ward was named Spitalfields and Banglatown in 1998 as a reflection of the important presence of the community around Brick Lane, the neighbourhood's north south spine, well known for curries but now offering an increasingly diverse cuisine.

"... the architectural, social and cultural history of Spitalfields is as rich and as extraordinary as that found in more apparently exotic locations."²

Dan Cruickshank

Spitalfields today

- 2.8 Spitalfields remains a unique and special place. The Spitalfields Neighbourhood Area contains an abundance of interesting and eclectic historic buildings; has several vibrant markets; houses; many small, medium and large businesses both creative and corporate. The area is home to many different communities and is of special cultural significance to the British Bangladeshi community who form a substantial proportion of the local residential population. What people love about Spitalfields is its relaxed diversity, its sense of community, and the appreciation of the layers of history that suffuse its streets, not uniform and stuccoed in a single past, but richly varied spanning from Roman times to the present day.
- 2.9 Businesses, residents and tourists all hope to thrive in this well-connected part of Central London, which counts as its neighbours the City of London – one of the world's top global financial and legal services hubs; Shoreditch - a vibrant night-time economy spot and an increasingly important technology hub centred around Old Street roundabout; and Whitechapel – the main east/west thoroughfare, richly historic neighbourhood and important administrative centre. The UNESCO World Heritage Site of The Tower of London is a short walk south from Spitalfields.

Pressures and challenges in Spitalfields

- 2.10 The area has come under intense pressure in recent years as an employment centre, reflecting the success and growth of the City of London. This has combined with a growing popularity of Spitalfields as a destination for local, regional, national and international tourists who come for the many markets, restaurants, pubs, bars, architecture and history. A successful commercial hub has been developed in and around the Truman Brewery with a strong fashion and creative focus and the tech industry around Shoreditch and Old Street roundabout is expanding at pace towards and into the Spitalfields Neighbourhood Area.

² Cruickshank, D., *Spitalfields: A History of a nation in a handful of streets* (2016)

- 2.11 The consultation exercise conducted by the Neighbourhood Forum, which included both a survey and a comprehensive set of interviews with key stakeholders identified the strong connection that everyone had with the character of the area: creative, dynamic, diverse, vibrant, lively, attractive, historic and relaxed. However, this very character is threatened by what many perceive to be over-development by businesses, both small and large, seeking to cash in on the neighbourhood's popularity.
- 2.12 The attendant pressures on space have created widespread affordability concerns for the small businesses that lend so much to Spitalfields' reputation, as well as for local residents, many of whom have been priced out of the homes they grew up in.
- 2.13 The arrival of Crossrail is likely only to increase these pressures and their impact on the residential population, which includes a high number of deprived households. The 2011 census shows 46,030 people living in 18,440 households within 800 metres of Brick Lane District Centre, making it the 4th most densely populated town centre in Tower Hamlets (ref. Tower Hamlets High Streets & Town Centres Strategy 2017 – 2022). The total resident population of the Spitalfields Neighbourhood Area has been estimated to be 6,572 people.³
- 2.14 Spitalfields, whose name derives from the fields which adjoined the new hospital of St Mary without Bishopsgate, suggests a green and leafy place. But the fields have long since disappeared under centuries of construction and the neighbourhood suffers from a lack of urban greenery. The poor provision of public open space combines with the thundering London thoroughfare, Commercial Street, which splits the neighbourhood in two. Commercial Street is also a red route and carries a huge weight of traffic seeking to avoiding the Central London Congestion Charge. The consequence is poor air quality and noise.
- 2.15 Three major areas of concern were identified during the consultation process – provision of local housing, litter and Anti-Social Behaviour.
- 2.16 The need for additional housing that is affordable is identified as a key issue in Spitalfields. The Tower Hamlets Local Plan 2020 has recognised this and has policies which seek to address the matter. Specifically:
- i. Policy S.H1 (Meeting housing needs) requires the delivery across the borough of at least 58,965 net additional homes by 2031, with at least 50% of these being affordable. It must also ensure that new housing provides for the range of needs of the community.
 - ii. Policy D.H2 (Affordable housing and housing mix) requires development to provide the appropriate mix of affordable housing (rented and intermediate housing) and of dwelling sizes.
- 2.17 These policies together are sufficient to improve the availability of housing of the right type in Spitalfields and the Neighbourhood Plan fully supports their implementation. Housing development is encouraged within the Neighbourhood Area, particularly where there are opportunities to deliver this as part of a mix of uses where housing schemes would otherwise be

³ Local Government Association, 'Basic Facts about Spitalfields Neighbourhood', based on 2011 National Census data at super output area level.

unviable. It will be important that any such development does not compromise the stated objectives of the Neighbourhood Plan.

- 2.18 To address the litter problem, more bins have recently been provided by the Borough Council although there are still problems with the frequency of emptying. The Forum will continue to encourage the Council to enhance the refuse collection service in the Neighbourhood Area, but it is considered that any direct funding or involvement in rubbish, e.g. buying more bins, using CIL monies was beyond the scope of this plan.
- 2.19 Anti-Social Behaviour (ASB) issues are very difficult to fix when creating guidelines for new developments. Operating CCTV and the deployment of Council enforcement officers and police is not something a Neighbourhood Plan can demand. The area urgently needs public toilets. The Forum did consider a site allocation for the former toilets outside Christ Church and another one on Bell Lane, but we were advised this could end up being an impediment to getting new toilets delivered to the area.

Planning context

- 2.20 The area is covered by the Tower Hamlets Local Plan, adopted in 2020. It is made up of a patchwork of distinct planning zones:
- There are four Conservation Areas in the Spitalfields Neighbourhood Area:
 1. Brick Lane and Fournier Street
 2. Elder Street
 3. Artillery Passage
 4. Wentworth Street.
 - The western edge is part of the City Fringe zone given special status in the London Plan. "The City Fringe/Tech City OAPF should nurture the employment, business and creative potential of the digital- creative sectors and ensure that suitable commercial floorspace, supporting uses and related infrastructure is available to meet the needs of this growing cluster." (ref. London Plan Annex 1 - Opportunity and Intensification Areas)
 - The area west of Commercial Street is in the Central Activities Zone (CAZ) designated in the London Plan. This is classified as a preferred office location (POL) and split into secondary and tertiary POLs. The secondary POLs are locations where offices are the dominant use but some residential development is permitted. The tertiary POL - which makes up most of this area - has a more diverse range of uses although new proposals should predominantly provide employment floorspace.
 - The Brick Lane area is designated as a District Centre in the Tower Hamlets Local Plan and parts of it has its own identity as Banglatown.
- 2.21 Parts of the area sit within the protected views of St Paul's Cathedral and The Tower of London set out in The London View Management Framework and the Grade I listed Christ Church is recognised as an important local landmark, having a borough-designated view from Brushfield Street towards Fournier Street.

- 2.22 There are several active street markets in Brick Lane (along Brick Lane from Quaker Street to Bethnal Green Road, Sclater Street and Cheshire Street) and Middlesex Street (including Wentworth Street, Goulston Street, Castle Street, Middlesex Street, Strype Street and Bell Lane) (ref. Tower Hamlets High Streets & Town Centres Strategy 2017-2022), as well as privately run markets in Spitalfields Market, Old Spitalfields Market and the Truman Brewery.
- 2.23 Spitalfields is an area of very high archaeological significance with many layers of its history buried below modern ground level. As well as including the St Mary Spital Scheduled Monument, almost all of the Neighbourhood Plan area is an Archaeological Priority Area (APA), as identified in 2017, and is recognised as such in the Local Plan. Since 2017 further evidence has come to light which has increased the area's archaeological significance, including prehistoric and Roman finds as well as new research to define the route of London's Civil War defences and the location of the Brick Lane Fort.
- 2.24 Spitalfields contains a very large number of important national heritage listed assets. As noted in the City Fringe Opportunity Area Framework (2015), "The City Fringe includes a great number of designated heritage assets and many buildings and spaces of heritage value. These are very important for the character of the area and continue to make an important contribution to the attractiveness of the area for creative industries."

3 VISION AND OBJECTIVES

Vision for Spitalfields

The Neighbourhood Plan's vision is to conserve and improve all the ingredients that come together to make Spitalfields such a distinctive and attractive neighbourhood. Throughout the period to 2035 we want to maintain the delicate balance between businesses - large or small, corporate or creative - local residents, and local, national and international visitors. They all compete for the 21st century's scarce urban resource - the space to live, work, rest and play. We want to ease the many pressures of inner city living which impact both publicly and privately held indoor and outdoor space. We want to enable the different parts and peoples of the area to work together harmoniously by conserving the cherished sense of place; protecting the distinctive urban grain; maintaining the vibrant cultural character; and helping local commercial and retail enterprises thrive as they welcome visitors into a safe, clean and entertaining environment with the broadest of offerings.

Objectives

- 3.1 Following an extensive consultation exercise in which key stakeholders were interviewed and a broad opinion survey was carried out, we have identified the key areas of concern for those who care about Spitalfields and Banglatown. We have grouped our policies under three objectives which reflect these areas of concern:

1. Environment
2. Urban Heritage
3. Business Mix

1. Environment

Objective 1: To provide as much greenery as possible in this deeply urban area

- 3.2 The area has precious little green space and this must be protected. The public benefit of even the small patches of open space available in this neighbourhood cannot be underestimated and it should be improved, better maintained and kept litter and debris free. Any opportunities for further planting of both trees, pocket parks and innovative green environmental solutions in new developments will be encouraged. We want to increase biodiversity, improve air quality, and ensure that healthy and fulfilling outdoor living and leisure activities are encouraged, facilitated and promoted.

2. Urban Heritage

Objective 2: To protect and enhance the historic built environment

- 3.3 The charm of Spitalfields' historic built heritage must be preserved and conservation area policies and regulations, including archaeology, should be adhered to and defended. The plan seeks to preserve the unique character of Spitalfields and we have divided the neighbourhood into 17

Local Character Areas which provide more detail on the built environment and which further elaborate the existing conservation area character studies published by the council.

- 3.4 Opportunities to enhance the existing built environment should be encouraged. The Plan formally identifies and protects a series of 'Non-Designated Heritage Assets', these being interesting historic buildings and artefacts. The atmosphere of a neighbourhood is created by its buildings and their facades and fabric as well as the spaces in between.
- 3.5 The Plan recognises that it is not possible or desirable to preserve the area in aspic. New developments, especially larger scale developments must respect the distinctive urban grain and street pattern which are a widely appreciated defining characteristic of the neighbourhood. Change and adaptation should not be allowed to impose new buildings with an excessive height and scale compared with their surroundings. The strategic role of the City Fringe, while welcomed for its economic benefits, should not be allowed to overwhelm the character and mostly low-rise charm of Spitalfields. Future developments should not cause an unacceptable deterioration of sunlight.

3. Business Mix

Objective 3: To maintain the special and diverse business mix that has settled in the area whilst maximising the employment opportunities that result from the neighbourhood's prime location and to support the small scale creative and artisan businesses that have always been part of the Spitalfields story.

- 3.6 New development should have a positive effect on the business and residential mix of the neighbourhood. Affordability is a concern and where appropriate, affordable business units should be delivered.
- 3.7 New businesses should be encouraged to respect the existing population of the area. Existing, small scale local businesses should be nurtured and supported. The retail offering should be broad and spread across the area. It should not become monolithic or monocultural. The policies in this plan seek to preserve a mixture of business uses occupying its premises.
- 3.8 The Plan lists a number of projects which will be prioritised in collaboration with the council and seek to improve and enhance the layers of story and history which lie across the neighbourhood.

Broader objectives

- 3.9 The Forum wants the Plan to help improve the communications between key stakeholders and groups in the area to allow a freer, democratic structure to voice local concerns and enhance the dialogue with the local authority and neighbouring wards and boroughs. Throughout the period of the plan the sense of community spirit and cohesion will be fostered and increased. The neighbourhood will continue to support a diverse range of communities and life for all ages and incomes and this is a consideration for all the policies.
- 3.10 The Forum also wishes to enhance the flow of visitors, residents and workers and passers-by through the area, with better signage and improved connectivity. We will continue to work with the statutory authorities to ameliorate the detrimental effect of heavy traffic in the neighbourhood.

- 3.11 Pollution, noise, anti-social behaviour and crimes against property and people have a detrimental effect on the quality of life in the area and should be mitigated. Initiatives to improve safety and cleanliness of the streetscape will be encouraged.
- 3.12 This Plan will make Spitalfields a cleaner, less cluttered and less congested place. The Spitalfields neighbourhood will be easier to access, be safer and more welcoming to visit. The Plan aims to provide a better quality of life for workers, businesses, visitors and residents, whatever their abilities, income, or cultural background.
- 3.13 The Neighbourhood Plan has been assembled during the global Covid-19 outbreak, whose impact will have far reaching and as yet unknown consequences. The many challenges it will be present can also bring opportunities to strengthen the local community support that has been manifest during Spring 2020 and to continue to support local businesses as they re-emerge from lockdown.
- 3.14 There is a strong desire to keep Spitalfields:
- green - the clean air from less traffic is welcome;
 - peaceful - the noise reduction from fewer cars is beneficial;
 - safe - the police presence on the streets is comforting;
 - open for business - supporting local business with improved tenant/landlord communications;
 - historic - recognising the importance of conservation policy in the built environment;
 - creative - providing space for artistry, craftsmanship and culture to flourish.

4 URBAN HERITAGE

- 4.1 The historic environment plays a huge part in people's understanding and appreciation of Spitalfields. Its heritage brings tourism and business but is also fundamental to the lives of thousands of people who live or work in the area.
- 4.2 Spitalfields is an area of outstanding heritage value, with a complex and varied history covering many centuries, from Roman and medieval origins, through 18th century development, and successive waves of immigration from Europe and Asia, right up to the contemporary cultural heritage of Banglatown and the area's world-renowned street art. Its heritage significance encompasses all four aspects of value identified in Annex 2 of the National Planning Policy Framework, namely archaeological, architectural, artistic and historic, and in all these respects the significance of Spitalfields is very high.
- 4.3 This is already recognised by the statutory listing of a great many buildings within the area, some at the highest level of Grade I and Grade II*, and by the designation of Scheduled Ancient Monuments and Areas of Archaeological Priority. Recently there have been finds of prehistoric and Roman artefacts and new research has been undertaken to better define the route of London's Civil War defences and the location of the Brick Lane Fort. The potential presence of these undesignated assets of national importance only increases the area's archaeological significance. Most of the area covered by the Spitalfields Neighbourhood Plan lies in one of four long-established Conservation Areas, namely Artillery Passage, Brick Lane/Fournier Street, Elder Street and Wentworth Street. There are also a number of locally listed buildings.
- 4.4 The Forum recommends that when consultations on new development proposals in the Spitalfields Neighbourhood Area are being undertaken the appropriate planning authorities should endeavour to consult relevant heritage groups with a key interest in Spitalfields including, for example, the Spitalfields Historic Buildings Trust, the East End Preservation Society, The Georgian Group and the Victorian Society.
- 4.5 There is a strong existing policy framework covering the Spitalfields Neighbourhood Plan Area. These comprise:
- Government policy, as set out in the National Planning Policy Framework 2019, notably Section 12 'Achieving Well Designed Places' and Section 16 'Conserving and Enhancing the Historic Environment', and national Planning Practice Guidance.
 - The Intend to Publish version of the London Plan (2019).
 - London-wide policies contained within the London Plan 2016.
 - GLA City Fringe Opportunity Area Planning Framework 2015.
 - Borough-wide policies contained with the Local Plan for Tower Hamlets, adopted in January 2020, notably Section 3 'Creating Attractive and Distinctive Places' including Policy S.DH3 'Heritage and the Historic Environment', and Section 4 'City Fringe Sub-Area' which identifies Spitalfields as a character place.
 - The Town Centre Hierarchy in the neighbourhood, including Brick Lane District Centre and Wentworth Street CAZ Retail Frontage.

- Appraisals and Management Guidelines for Artillery Passage Conservation Area 2007, Brick Lane/Fournier Street Conservation Area 2009, Elder Street Conservation Area 2007 and Wentworth Street Conservation Area 2007.
- London Borough of Tower Hamlets Shopfront and Roller Shutter Guide (non-formal guidance).

- 4.6 The Spitalfields Neighbourhood Planning Forum considers that additional policies are needed to support, reinforce and supplement the existing policy documents listed above because those policies do not always address the specific characteristics of Spitalfields. They are considered to be in general conformity with the hierarchy of existing policies but are intended to be specific to the Spitalfields Neighbourhood Plan Area as a whole and appropriate for the sensitive and sustainable preservation and enhancement of its remarkable heritage.
- 4.7 The Forum is aware that policies for the protection of the historic environment have to be balanced against other policies in the NPPF, London Plan and Tower Hamlets Local Plan for economic growth, housing provision, transport and sustainability, and with the presumption as set out in the NPPF in favour of development. However, in any balancing exercise in a place such as Spitalfields, great weight should be afforded to heritage considerations, in line with the NPPF. There are opportunities for new development to enhance the character and appearance of the heritage assets through a high-quality design led approach which is informed by the local character appraisal.
- 4.8 The data collected in the Neighbourhood Plan public survey (Commonplace Outreach Survey in 2018) showed that, with the exception of the provision of more public waste bins, the protection of local heritage was the single highest 'improvement' local people who took part in the survey wished to see across the whole Neighbourhood Plan Area. The main *positive* responses chosen by people taking part in survey when commenting on any particular place were, in descending order, that the area was 'historic', 'welcoming' and 'attractive'. People who live, work and visit Spitalfields value highly the heritage of large parts of the area and the way neighbourhood appears. This sense of urban heritage is manifested in the historic buildings and characterful places in Spitalfields which they see and appreciate being immersed within. The Plan therefore has policies that protect the physical fabric of the neighbourhood and conserve and enhance its rich urban heritage.
- 4.9 The second most commented on location in the survey was around Fournier Street in the historic Georgian centre of Spitalfields. The most frequent 'positive' and 'neutral' comments recorded in this area were focussed upon 'general praise' for the character of the area and calls for the preservation and conservation of its heritage. The single largest improvement people chose when commenting on this area was the 'protection of heritage'. This demonstrates strong support for the conservation and enhancement of historic areas of character. This desire to enhance and celebrate the urban heritage of Spitalfields is reflected in the many calls to restore historic road surfaces (cobblestones).
- 4.10 The third most commented on specific location in the survey was the Old Truman Brewery site and again, the aspect of the site which people appreciated most was that it was 'historic' but there was also strong support for this area to be further developed as a commercial space with well-designed buildings. This shows that whilst people who live in, work in and visit Spitalfields

appreciate its general sense of history and heritage, there is not a uniform view about the character or potential across the whole neighbourhood and people understand different parts of Spitalfields as having contrasting characters which should be reflected in variations in the type of development that is permitted.

- 4.11 The data collected in the Neighbourhood Plan survey of key local businesses and other major local stakeholders in 2017 and 2018 showed that the second most appreciated attribute of Spitalfields for them was the 'architectural heritage of the area'. Historic residential streets, examples of grand architecture, and the impressions made by different ethnic communities on the physical fabric of the area were also noted by a broad range of respondents.
- 4.12 The idea that the area had a varied character was also reflected in the stakeholder research. Respondents commented on the 'mixed use' of the area with its overlap of commercial and residential uses, as well as overlap of old and new buildings.
- 4.13 In order to gather more detailed evidence on these heritage matters, the Neighbourhood Forum commissioned a comprehensive survey of the area from acknowledged experts in the field, namely Dan Cruickshank and Alec Forshaw, to provide a street-by-street inventory of buildings and structures, including street furniture, that were considered to be of local architectural and/or historic interest. This was carried out in April/May 2020 and comprised visual recording and fieldwork and recourse to existing reference documents. It did not involve internal building inspections. Appendices B and D are the result of this work.

Protecting the physical fabric of Spitalfields

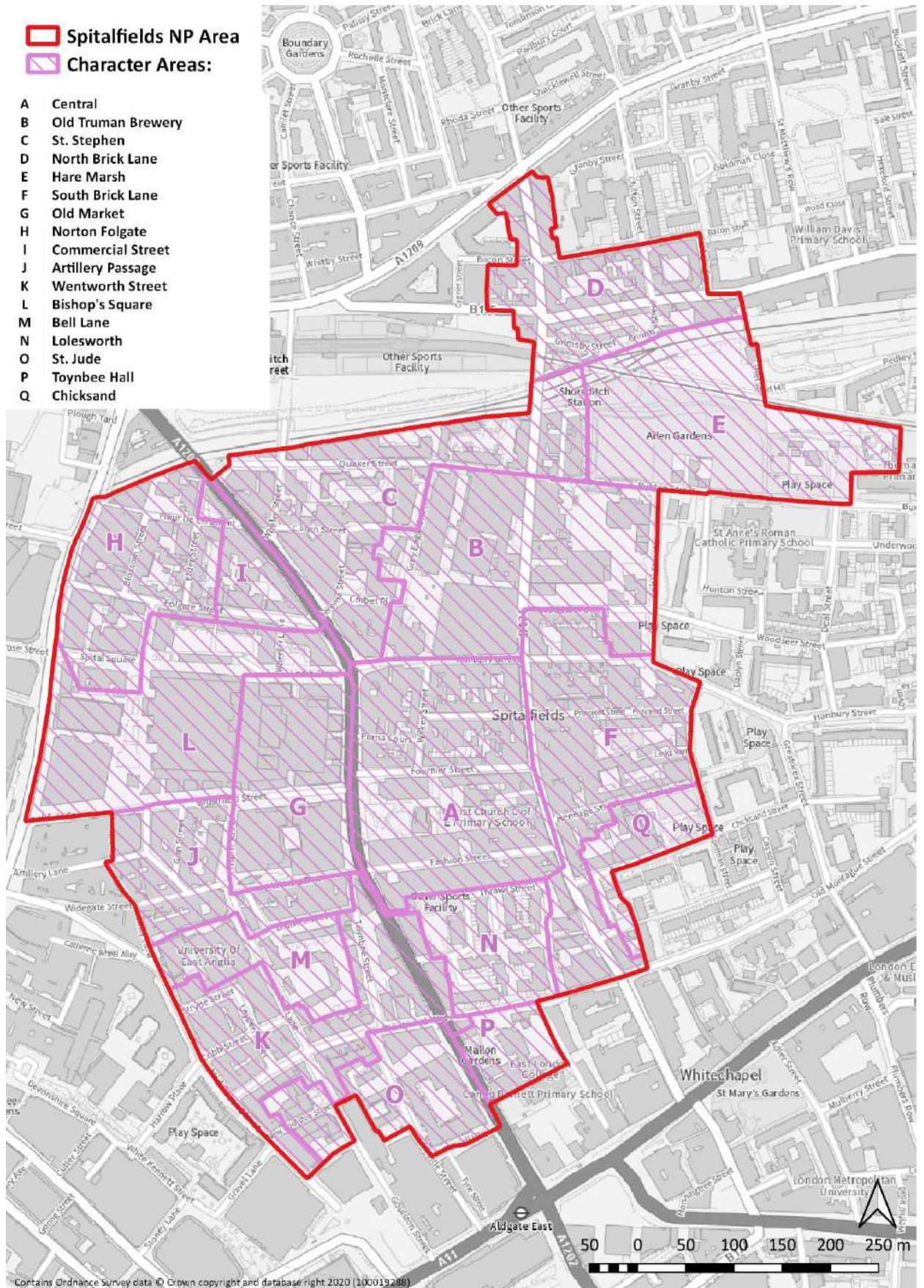
- 4.14 It is important that all applicants and decision makers have a good understanding of the heritage significance and townscape qualities of Spitalfields and the potential impact of any proposed development. There are Character Appraisals and Management Guidelines for all four conservation areas which are within or partly within the Spitalfields Neighbourhood Plan Area as well as the Local Character Area appraisals in this plan (Appendix A). These appraisals contain detailed analyses of the history, character and appearance of each individual area. Figure 4.1 shows the boundaries of the Character Areas, with Appendix A showing more detailed maps of each individual area.
- 4.15 The urban grain and the height of the different parts of Spitalfields should be contextually respected as detailed in the Local Character Area appraisals.
- 4.16 The importance of carefully controlling the scale, mass, footprint and materials of new development is already recognised in generic terms in the Local Plan (Policy S.DH1) but these need to be applied with regard to the special and specific character and appearance of Local Character Areas in Spitalfields. They should reinforce recommendations that already exist in the Management Guidelines for the four conservation areas which encompass most of Spitalfields and particularly as detailed in the Local Character Area appraisals.
- 4.17 The Local Plan and the NPPF recognise the importance of the setting of heritage assets, and the character area guidance included in Appendix A provides important context for understanding the setting of heritage assets within the neighbourhood area. When decisions are made on proposals located outside the neighbourhood area, but which are identified as potentially

impacting the setting of heritage assets within the neighbourhood area, the character area guidance is a relevant consideration in understanding the setting of the heritage asset.

- 4.18 The Conservation Area Appraisals and Management Guidelines for the four conservation areas identify a number of important views of particular landmarks or street vistas, although these are not always particularly specific or detailed. Policy D.DH4 of the Local Plan states that “Development will be required to demonstrate how it preserves and enhances local views identified in conservation area appraisals and management guidelines”.
- 4.19 There is scope and encouragement for high quality contemporary design, which respects context and meets the requirement to preserve and enhance the character and appearance of the Local Character Areas whilst making the best use of land and meeting the need for housing and employment floorspace. The aim should be to reinforce and strengthen the existing local distinctiveness of Local Character Areas in Spitalfields, including the appropriate materials and colours for new buildings and extensions.
- 4.20 There will be situations where the use of contrasting materials and/or colour in a development would make a positive contribution to Spitalfields, and there are existing examples of this. As with all proposed developments, this would be assessed on a case by case basis and would depend on the Local Character Area in which it is located as well as its immediate context.
- 4.21 There were calls through the stakeholder research to attempt to preserve the ‘unique visual culture’ of areas of the neighbourhood associated with the British-Bangladeshi community, in particular, the recognition of particular heritage assets important to that community which are not designated or given any formal protection and are found in some areas of the neighbourhood, particularly on Brick Lane.
- 4.22 Whilst across the Neighbourhood Area there are already many statutorily listed buildings and a number of locally listed buildings, there are also many other buildings and structures that contribute positively to the character and appearance of Spitalfields. The most important of these buildings and structures that are not already statutorily or locally listed have been identified in Appendix B. It is important that these are recognised and identified so that their heritage value can be retained and enjoyed by all. This includes items of street furniture or surfacing, which are not controlled by planning applications, but can too easily be lost or eroded if their significance is not recognised. This is compatible with Policy S.DH3 (Heritage and the historic environment) of the Local Plan which recognises the importance of both designated and non-designated heritage assets, and a presumption in favour of retaining unlisted buildings that make a positive contribution.
- 4.23 Significant archaeological remains survive in the area and this is recognised by the designation of the St Mary Spital Scheduled Monument and the inclusion of almost all the Neighbourhood Plan area within an Archaeological Priority Area. It is now known that human activity was drawn to the area on the watershed between the Wallbrook and the Black Ditch more than 5,000 years ago, a significant time depth. The better-known Roman, medieval and Huguenot heritage of the area is only part of the time span. This will be an important consideration in any construction work that disturbs potential archaeological remains, potentially almost anywhere within the area.

- 4.24 A list of 'assets of historical interest' are provided in Appendix D. Although not subject to any policies in this plan, these items were noted by conservationists as being of local historical interest.
- 4.25 A subject raised by some local people as a concern is the presence of illegal street art/graffiti on certain buildings across the Neighbourhood Area. Such activity is not specifically a matter that can be controlled by planning policy and therefore cannot be controlled by this Plan. Further, while graffiti or street art on a building which has not been authorised by the owner of that building is illegal, street art on a (non-statutorily listed building) which is authorised by the owner of that building is not illegal. Certain types of authorised street art are considered to enhance the townscape of an area, and indeed street art is an element of the character of certain parts of the Spitalfields area, but it is felt by the Neighbourhood Plan that there should be a balance, with street art being in appropriate locations and not being painted illegally.

Figure 4.1: Spitalfields Character Areas



POLICY SPITAL1: PROTECTING THE PHYSICAL FABRIC OF SPITALFIELDS

- A. All development, including new buildings and extensions or alterations to existing buildings, shall be of a high quality of design, which complements and enhances the local character and identity of Spitalfields.
- B. All applications should demonstrate how the proposal addresses the key elements of the character and appearance of the Spitalfields area including the impact on any conservation area and Local Character Areas identified in Figure 4.1 and Appendix A within which the application site sits or adjacent to it, and the impact on the setting of listed buildings and other heritage assets.
- C. All applications which have an impact on the significance of heritage assets, including archaeology, or their setting must be accompanied by a Heritage Assessment or a programme of archaeological investigation.
- D. New development should interact and interface positively with the street and streetscape described in the Local Character Area in which it is located⁴, including respecting existing or, where possible, historic street facing building lines and frontages.
- E. Development should contribute positively to the character of existing and nearby buildings and structures, and should have regard to the form, function and heritage of its Local Character Area.
- F. Development should be sensitive to its setting and should respect the scale, height, mass, orientation, plot widths, and grain of surrounding buildings, streets and spaces. This applies within the Local Character Area within which the site is located, and, where relevant, where it directly impacts an adjacent Local Character Area.
- G. Development should have regard to any impact on the local views identified in the relevant Conservation Area Appraisal or Character Area Appraisal.
- H. New development should generally favour a palette of materials and colours that is sympathetic and harmonious within the context of its Local Character Area.
- I. Development should secure the sustainable management of archaeological heritage, including undesignated archaeological remains of demonstrably equivalent significance to a scheduled monument.
- J. The buildings and structures in Appendix B are considered to be non-designated heritage assets (NHA) which contribute to the character and appearance of Spitalfields. There should be a presumption in favour of their retention and of the protection of the elements of each NHA which contribute to that character and appearance.

⁴ The Local Character Area Appraisals are presented in Appendix A.

Land use, activities and frontages

- 4.26 The range of uses and activity in Spitalfields are integral to its character, just as its buildings and structures are integral to its appearance. The overriding character of the area is of a wide mixture of business, leisure and residential uses, often cheek-by-jowl, which gives the area diversity, vitality and a rich and varied community focus.
- 4.27 Section 3 of the Local Plan, 'Creating Attractive and Distinctive Places', recognises that land use is a vital component for heritage protection. The retention of active and attractive street frontages is essential to the preservation and enhancement of Spitalfields.
- 4.28 The existing characters and appearances of the Local Character Areas of Spitalfields, including their grain and scale, and the rhythm of their frontages should be respected. Where appropriate with respect to that local character, any proposals to consolidate small, ground floor level commercial units must ensure that the design does not detract from the width of the original properties so that this important character is retained.
- 4.29 Shop fronts and signage are an important contribution to the character and vitality of the area. Well-designed frontages and signage enhance the function and vitality of streets. Attractive and historic shop front features should be retained, and reinstated where missing.
- 4.30 Equally, new commercial shopfronts should be informed by the existing commercial shopfront features in that Character Area and should also be informed by the Borough Council's Shopfront and Roller Shutter Guide. Solid security shutters on commercial property can result in an unattractive, sterile and hostile environment when premises are closed, which harms the character and vitality of the area. This must be balanced against the need for security to protect commercial businesses from burglary and vandalism.
- 4.31 Various local stakeholders, through the Neighbourhood Plan research, cited the consolidation of small commercial units into larger ones as being detrimental to the local area in terms of its character. This relates to the impact that poorly designed, large shopfronts have on the rhythm of certain streets in particular which have a fine grain. Such proposals for consolidation must be designed with particular care to ensure that they do not represent a visual break to this architectural rhythm.

POLICY SPITAL2: LAND USE, ACTIVITIES AND FRONTAGES

- A. New development should maintain and create a positive relationship between buildings and street level activity, including the provision of appropriate activities at ground floor level facing and fronting the street as set out in the Local Character Area appraisals.**
- B. Any consolidation of ground floor commercial, business and service (Class E uses) units must respect the rhythm of the street and ensure that there is no detrimental impact on the appearance of the Local Character Area.**
- C. New or altered shopfronts and signage should demonstrate a high quality of design that preserves and enhances the character and appearance of the Local Character Area within which the application sits.**
- D. Original features such as recessed doorways, pilasters, mouldings and fascias should be retained and repaired where damaged.**

Public realm

- 4.32 Both Section 3 of the Local Plan, 'Creating Attractive and Distinctive Places' and Section 4 'Protecting and Managing Our Environment' seek the provision of attractive and sustainable public realm. The historic street plan of Spitalfields is an integral part of its character and appearance and there may be opportunities to reinstate elements that have been lost as part of more recent development.
- 4.33 Historic surfacing materials, such as York stone paving and granite setts and kerbs, and historic street furniture such as bollards, coal hole covers and street signs are important to the character and appearance of the area and must be retained. The existing Conservation Area Management Guidelines already reference opportunities to expose and repair areas of granite setts that are currently hidden beneath tarmac or damaged by trenching.
- 4.34 In new areas of public realm and in renewal and enhancement schemes the materials used should be appropriate to and respect their context. For most of the Spitalfields area this will mean traditional materials should normally be used. The aspiration to repair existing historic paving, carriageway surface and street furniture on public land is intended to apply specifically to incidences where the asset has been damaged by roadworks (e.g. utility works) or by road traffic accidents and efforts should be made to return the said asset so far as is reasonably practicable to its previous state.
- 4.35 Such is the importance of heritage to the community that lives and works in Spitalfields that the Forum consider it appropriate to outline a range of projects to be funded by CIL receipts which are designed to improve or enhance the urban heritage value of Spitalfields and are detailed in the project list in Table 4.1.
- 4.36 These policies are supported by 16 Local Character Area appraisals including descriptions of local views, a list of non-designated heritage assets and a CIL Project List.

POLICY SPITAL3: PUBLIC REALM	
A.	The existing layout of streets, alleys and passageways in Spitalfields should be retained.
B.	Existing historic paving, carriageway surface and street furniture which are on public land should be retained and, where appropriate, repaired to a high standard.
C.	Where the opportunity arises in new development, the reinstatement of historic building lines and former streets, alleys or passageways will be encouraged, provided this does not materially increase the risk of crime.
D.	Where practical and viable, major new development should seek to create new areas of public realm which are accessible to the local community.
E.	Where appropriate new development that provides public realm should do so in a way that responds to the archaeological heritage of the site and its surroundings.

Heritage projects

4.37 Table 4.1 below provides a list of heritage projects which are important to address the objectives of the Neighbourhood Plan. For the avoidance of doubt the list of projects is not in order of priority. They are also projects which CIL funding should be used for where possible.

Table 4.1: Priority heritage projects to be funded and delivered

No.	Project name	Description
1	Restore and reinstate the historic cobbles on Wilkes Street, Princelet Street (west), Fournier Street and Fashion Street.	Carefully remove tarmac, fill in gaps with new cobble setts where roadworks have removed historic cobble setts. There has been consistent strong support from residents of these streets for this and is a recommendation on the Brick Lane & Fournier Street Conservation Area guidelines adopted by LBTH to reintroduce historic street surfaces.
2	Restore street furniture outside Christ Church Gardens	Reconnect the drinking fountain outside Christ Church Gardens to a drinking water supply. Repair the telephone box and seal the door shut to prevent misuse.
3	Restore and reinstate the historic cobbles on Grey Eagle Street, Corbet Place, Jerome Street and Calvin Street.	Carefully remove tarmac, fill in gaps with new cobble setts where roadworks have removed historic cobble setts.

No.	Project name	Description
4	Restore and reinstate the historic cobbles on Brushfield Street, Gun Street, Steward Street and Artillery Lane.	Carefully remove tarmac, fill in gaps with new cobble setts where roadworks have removed historic cobble setts.
5	Pavement project in in Local Character Area A	Where appropriate, replace concrete and tarmac pavements in Local Character Area A with York Stone. This will help enhance the Conservation Area. There has been consistent strong support from residents of these streets for this and is a recommendation on the Brick Lane & Fournier Street Conservation Area guidelines adopted by LBTH to reintroduce historic street surfaces. Also, where possible, to locate, repair and repaint in correct manner any “Christ Church Spitalfields” parish bollards held by Tower Hamlets in storage and return them to suitable locations within the aforementioned conservation area.
6	Provide Outdoor Public Seating on main shopping and market streets	In suitable locations place outdoor public seating along Commercial Street, Wentworth Street, Brick Lane and Hanbury Street. We recommend these seats should have a bespoke design that celebrates the local heritage of Spitalfields and Banglatown. The seats should be designed to prevent people sleeping on them.
7	Street light project in Local Character Area A	Replace the lighting or adjust down the colour temperature of existing light fittings/source in lamp-posts, in Local Character Area A to provide a softer, more yellow tone of lighting appropriate for the historic character of that Local Character Area.

5 OPEN SPACES AND ENVIRONMENT

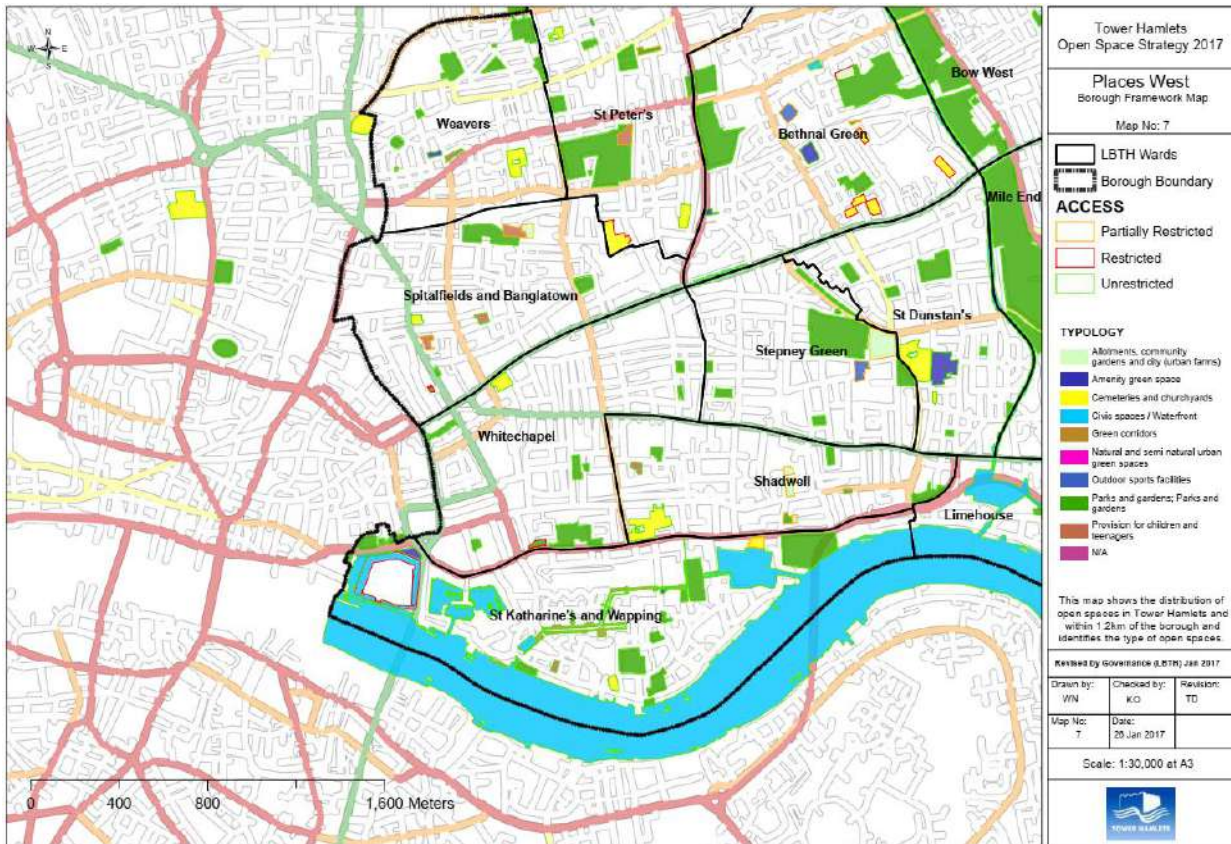
- 5.1 Spitalfields is a densely inhabited part of Inner London. The proportion of homes with private gardens is unsurprisingly low. Over recent years it has become apparent how access to green spaces has a significant benefit on our health, both physical and mental. Not only do green open spaces provide places for leisure and general enjoyment, but they also reduce the direct impact of air pollution (mainly produced by vehicles), exposing people to lower levels of nitrogen dioxide and particulate matter for shorter periods of time. Exposure to air pollution is a significant issue in Spitalfields.
- 5.2 The Neighbourhood Plan research shows that green spaces, the environment and open space are priority issues for local people.

Facilitating urban greening

- 5.3 Large parts of Spitalfields have a significant deficiency of open space (in particular in the south and west), based on the recognised standard for the required level per 1,000 population. The Tower Hamlets Open Space Strategy 2017 projected that in 2020 Spitalfields and Banglatown ward, within which the Spitalfields Neighbourhood Forum Area sits, would have approximately 0.2 hectares of open space per 1,000 population⁵, where less than 0.5 hectares means that an area is classified as having a high level of deficiency. This makes it one of the three most open space deficient wards in the borough. Figure 5.1 shows that the City Fringe area generally lacks the quality and range of open space of locations such as Mile End and Bow West.
- 5.4 The Open Space Strategy 2017 identifies the provision of a pocket park as one of the principal ways that this deficiency may be reduced. This will help to provide improved connectivity to existing open spaces. Local Plan Policy S.OWS1 (Creating a network of open spaces) specifically identifies Spitalfields and Banglatown ward as a location where such opportunities must be maximised. This is set against a backdrop of development sites have limited opportunities to provide conventional open space due to their limited size.

⁵ LB Tower Hamlets (2017) *Parks and Open Spaces: An open space strategy for the London Borough of Tower Hamlets 2017-2027* – Figure 48

Figure 5.1: Open spaces in the western Tower Hamlets area, by type



Source: Tower Hamlets Open Space Strategy 2017

- 5.5 The Green Grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets. 'Green' means both places where trees and vegetation should be planted and also routes where people can walk and cycle more, thus improving health and reducing emissions due to lower car use. The Allen Gardens area is identified in the Open Space Strategy as one of the strategic projects for improving the Green Grid. This is part of the strategy to enhance permeability for pedestrians between Bethnal Green to the North and residential areas located south of the Greater Anglia railway line towards Whitechapel, passing through Spitalfields. Specifically it proposes to link St Matthews Row with Allen Gardens over the existing footbridge linking Cheshire Street and Pedley Street and down the existing pedestrian/cycle path. The proposals are to create a high quality walking environment through extensive renovation, including improvements to materials, lighting and visibility on the footbridge and seating and planting in Allen Gardens and way finding to it. This would contribute towards the Mayor of London's 'Healthy Streets' concept which seeks to improve health through increased levels of walking and cycling.
- 5.6 The Spitalfields community also identified a number of other locations where improvements to green infrastructure could be made. These are identified as projects for investment, specifically through the use of CIL funding.

- 5.7 Generally there is a need to maximise the opportunities for urban greening. This is particularly important in areas of open space deficiency such as the south and west parts of Spitalfields, where the lack of green space increases the risk of experiencing the urban heat island effect, a phenomenon which is expected to worsen with climate change. Increasingly, more creative ways are being demonstrated about how greening can be achieved even in highly urbanised locations and on new development sites where space is at a premium. Local Plan Policy D.ES3 (Urban greening and biodiversity) requires all development to protect and enhance biodiversity. This includes through the maximisation of ‘living building’ elements such as green roofs, walls, terraces and other green building techniques.
- 5.8 There are ways in which such urban greening can thrive. For example:
- orientating buildings so that green walls face north reduces maintenance;
 - ensuring green roofs are designed to allow the maximum practical depth of the substrate;
 - opportunities are taken to plant trees in natural soils.

Urban Greening Factor

- 5.9 The draft London Plan has devised an ‘Urban Greening Factor’ (UGF) model⁶, to assist plan makers and developers in determining the appropriate provision of urban greening for new developments. The factors making up the UGF are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaptation and biodiversity conservation. A UGF score for a new development will be between 0 (worst) and 1 (best). In the absence of a target in a lower tier plan, draft London Plan Policy G5 (Urban greening) proposes a UGF score of 0.4 for predominantly residential development and 0.3 for predominantly B1 commercial development (offices and light industrial). This only applies to major developments⁷. Bespoke approaches are encouraged although the Local Plan does not include its own UGF.
- 5.10 The Urban Greening Factor for a proposed development is to be calculated in the manner set out in the emerging London Plan, currently being in the following way:
- (Factor A x Area) + (Factor B x Area) + (Factor C x Area) etc. divided by Total Site Area*
- 5.11 So, for example, an office development with a 600m² footprint on a site of 1,000m² including a green roof, 250m² car parking, 100m² open water and 50m² of amenity grassland would score the following:
- (0.7 x 600) + (0.0 x 250) + (1 x 100) + (0.4 x 50) / 1000 = 0.54*
- So, in this example, the proposed office development exceeds the interim target score of 0.3 for a predominately commercial development.

⁶ See ‘Intend to Publish’ version of the draft London Plan, pp.364-368

⁷ ‘Major development’ is defined in the NPPF as: for residential development, where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more; for non-residential development, additional floorspace of 1,000m² or more, or a site of 1 hectare or more.

- 5.12 It is therefore considered that a UGF for Spitalfields is appropriate. The draft London Plan is clear that this should take into account local circumstances in respect of matters such as poor air quality and deficiencies in green space. Given that these are both issues in Spitalfields, then it is considered that, as a minimum, using the draft London Plan's working UGF is justified. It is expected that development will be predominantly commercial but that residential development will still be significant.
- 5.13 Given the built characteristics of Spitalfields, it is considered that a number of high scoring urban Greening Factors could be delivered on many developments in the Neighbourhood Area:
- Designs for taller buildings can make significant contributions to a target score by including green roofs and green walls or by vegetating balconies and other features on upper floors.
 - Given that street level in Spitalfields is not completely shaded by very tall buildings, planting of trees which are large at maturity and provide more biomass, shade and amenity is an option.
 - For the same reason, planting of flower-rich perennials (which are biodiversity-rich habitats) and hedges, are capable of flourishing.

POLICY SPITAL4: FACILITATING URBAN GREENING

- A. Development is expected, insofar as is reasonable and practical, to maximise on-site urban greening and to support the enhancement of green infrastructure in Spitalfields. Features such as green walls, green roofs and tree planting must be designed in a way to minimise maintenance and maximise the longevity of the green infrastructure feature.**
- B. All major residential development proposals must seek to achieve an Urban Greening Factor (UGF) score of at least 0.4 and all major Class B1 commercial schemes a UGF score of at least 0.3. Where it is demonstrably not reasonably and practically possible to achieve the relevant score, provision towards off-site urban greening will be required. Such provision should firstly address the urban greening projects identified in Table 5.1.**
- C. Proposals to enhance the quality and accessibility of the Green Grid network through Spitalfields will be strongly supported.**

Local Green Spaces

- 5.14 Under the NPPF, Neighbourhood Plans have the opportunity to designate Local Green Spaces which are of particular importance to them. This will afford protection from development other than in very special circumstances. The NPPF says that the Local Green Space designation should only be used where the green space is:
- i. in reasonably close proximity to the community it serves;
 - ii. demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - iii. local in character and is not an extensive tract of land.
- 5.15 The following five areas, shown in Figure 5.2, are considered to fulfil all of the criteria of the NPPF:
1. Allen Gardens
 2. Spitalfields City Farm
 3. Elder Gardens
 4. Christ Church Gardens
 5. Chicksand Street Ghat
- 5.16 Detailed maps and information about each space are shown in Appendix C. Details of how each area fulfils the Local Green Space criteria is included in the supporting evidence base.

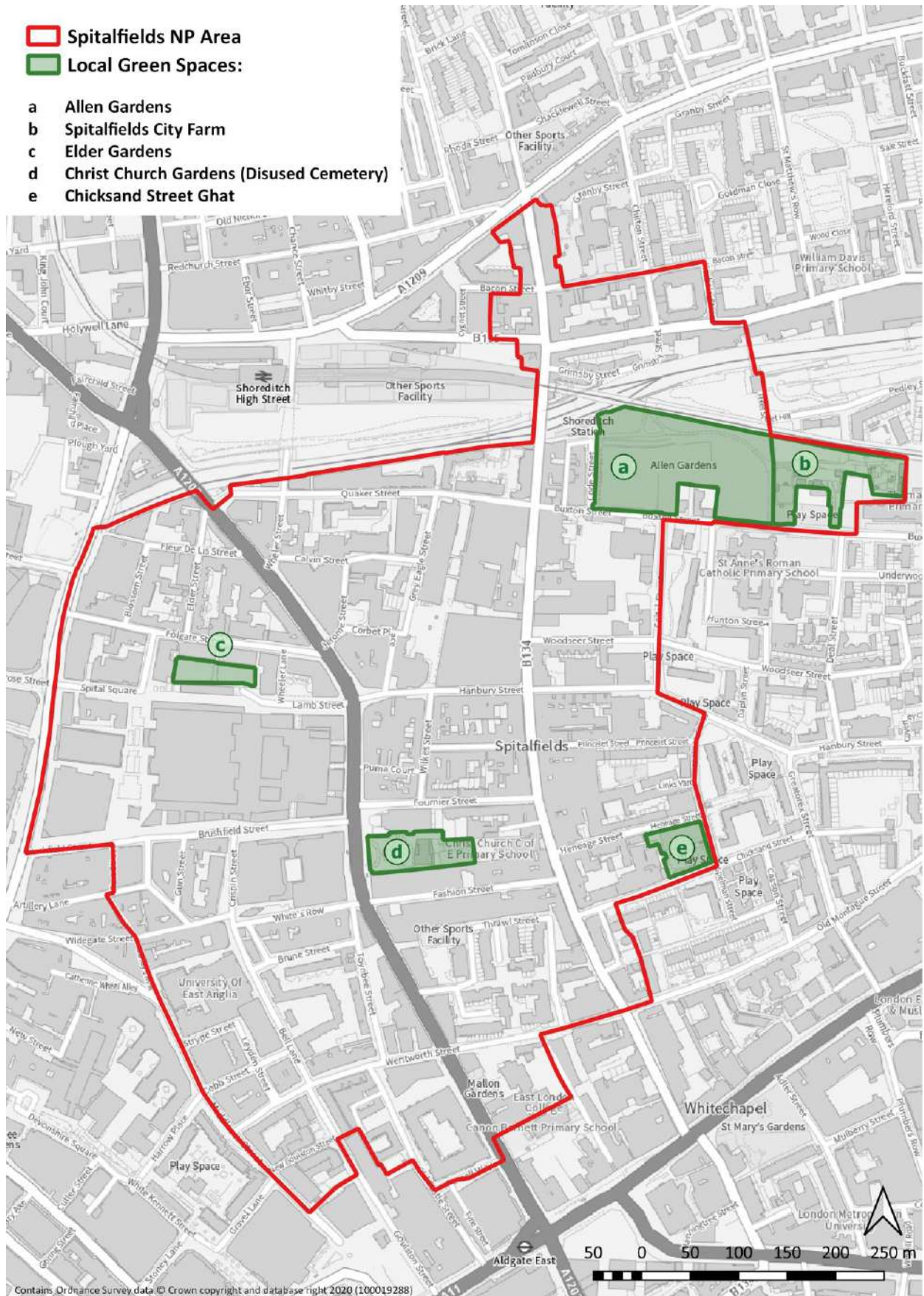
POLICY SPITAL5: LOCAL GREEN SPACES

A. The following 5 areas shown on the Policies Map and in Figure 5.2 are designated as Local Green Spaces:

- a. Allen Gardens
- b. Spitalfields City Farm
- c. Elder Gardens
- d. Christ Church Gardens
- e. Chicksand Street Ghat

B. Local policy for managing development on a Local Green Space should be consistent with national planning policy for Green Belts. Proposals for built development on Local Green Spaces will not be permitted unless it can be clearly demonstrated that it is required to enhance the role and function of that Local Green Space or that very special circumstances exist, for example where it is essential to meet specific necessary utility infrastructure and no feasible alternative site is available.

Figure 5.2: Local Green Spaces



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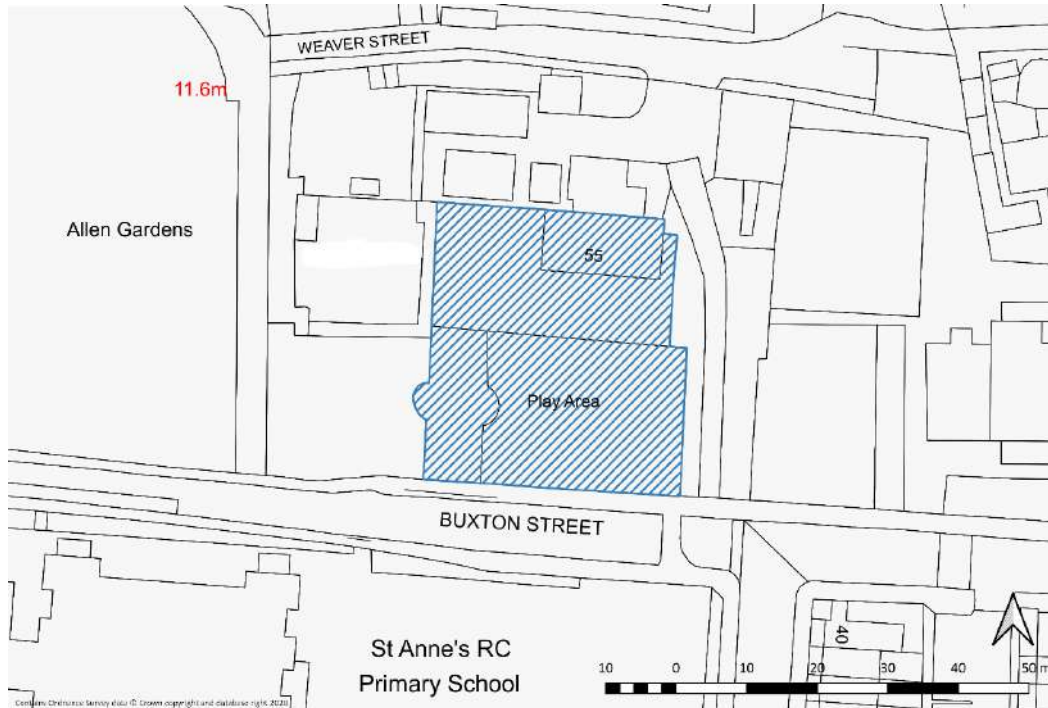
Ram & Magpie site

5.17 The Ram and Magpie site is named after a sculpture of a ram and magpie that is here on this site, having been commissioned under the Bethnal Green City Challenge in 1996. The sculpture remembers a pub of the same name which was located nearby in the early 20th century. The Ram and Magpie site was part of a Victorian cul-de-sac called North Place which was destroyed by enemy action



during the war. Currently on the site is a nursery facility; a temporary building used by Allen Gardens Playgroup (55 Buxton Street) and an adjacent play space. The hut used by the playgroup and the adjacent play space are located behind fences and reserved for the exclusive use of children enrolled at that playgroup. On the main part of the site, the largest part right alongside Buxton Street, there had been some publicly accessible play equipment, but this was removed to discourage anti-social behaviour and recycled as a climbing frame by the neighbouring Spitalfields City Farm for use by its goats. Despite this, serious anti-social behaviour continues on the main part of the site where the public play equipment had once been. This area is accessible from Buxton Street and is largely hardstanding.

Figure 5.3: Ram and Magpie site



- 5.18 Whilst not owned by Spitalfields City Farm, access to the site has been provided for its use via a gate direct from the farm. The space has been used in the past by the farm to exercise its donkeys and provide donkey rides on community event days. This includes its most important annual fundraising event, the 'Oxford and Cambridge Goat Race', which enables it to safely host food vendors with generator requirements. The Farm wishes to retain and formalise the access and use of the site to further its activities, mainly as a paddock space. It also wishes to use the space to provide wider benefits such as the creation of an accessible Forest School space to run workshops but also somewhere clean, safe and green to simply be enjoyed by the public during the farm's opening hours.

- 5.19 Policy SPITAL6 therefore identifies the priorities for this publicly accessible open space, namely to genuinely create an important opportunity to green the space, facilitate the activities of Spitalfields City Farm and reduce anti-social behaviour principally activity associated with drug use and prostitution.

POLICY SPITAL6: RAM AND MAGPIE SITE

Proposals to use the open space at the Ram & Magpie site (approximately 0.15 hectares as shown on the Policies Map and in Figure 5.3) for activities associated with Spitalfields City Farm will be strongly supported. Any such proposals must retain the open nature of the site.

Urban greening projects

5.20 Table 5.1 below provides a list of urban greening projects which are important to address the objectives of the Neighbourhood Plan. For the avoidance of doubt the list of projects is not in order of priority. They are also projects which CIL funding should be used for where possible.

Table 5.1: Priority urban greening projects to be funded and delivered

No.	Project Name	Description
1	Tree planting on Brick Lane	Trees to be planted on streets should preferably be native deciduous species with a preference for London Plane trees where space permits. London Planes are synonymous with iconic London locations and these trees already exist at 91 Brick Lane.
2	Planting suitable climbing plants on Calvin Street, Jerome Street and Grey Eagle Street	Wisteria, jasmine, honeysuckle and other fragrant and/or flowering climbing plants have been shown to be popular with the community. They would require wire supports and the identification of suitable locations. Suitable plots should be identified through a dialogue between LBTH and property owners facilitated by the Neighbourhood Forum.
3	Planting Wisteria in other suitable public locations, e.g. Brick Lane, Flower & Dean, Holland Estate	Wisteria is a successful climbing plant which has been shown to be popular with the community. It would require wire supports and the identification of suitable locations. The areas we recommend are the ends of terraces and boundary walls. Suitable plots should be identified by through a dialogue between LBTH and property owners facilitated by the Neighbourhood Forum.
4	Ponds in Allen Gardens for endangered amphibians and increasing biodiversity	The pond/s shall be specially designed for breeding amphibians with gently sloping sides and absent of any fish should be located in the eastern side of Allen Gardens either in the north east corner, or between Old St. Patrick's School and the children's play area (with suitable fencing around) or in the middle of eastern area where the existing wild area is. The ponds should also be surrounded by an area of wild terrestrial habitat suitable for amphibians to hibernate and forage in.
5	Re-wilding project on part of Allen Gardens to encourage birds	Planting of hawthorne, rowan and blackberries (brambles around the boundary wall of the Old St. Patrick School and adjacent building (35-37 Buxton Street) as well as around the perimeter of the envisaged pond area. This is to discourage graffiti and painting on that wall which is harmful to wildlife and provide food and cover for birds.
6	Re-wilding project on part of Allen Gardens to encourage butterflies and other invertebrates	Providing further space for wild grasses and flowers. Planting honeysuckle and flowering buddleia to provide food source for adult butterflies. Allowing an area to be set aside where nettles can grow and common buckthorn can be planted which will provide a food for several species of butterfly noted to be in their larval stage in the Borough biodiversity report.
7	Tree planting on Cheshire Street and Sclater Street	Trees to be planted on streets should preferably be a native deciduous species, flowering and climbing plants could be added to walls and should contribute to increasing biodiversity.

No.	Project Name	Description
8	Tree planting in Wentworth Street, Bell Lane and adjoining side streets	Trees to be planted on streets should preferably be a native deciduous species and contribute to increasing biodiversity.

Mural of a pair of *Great Crested Newts* displayed at the farm to celebrate local biodiversity



6 COMMERCIAL MIX

- 6.1 Small and micro-businesses are the lifeblood of the Tower Hamlets economy. Over 95% of the borough's businesses are defined as small businesses, employing fewer than 50 people⁸. Its 15,000 micro-businesses (10 or fewer employees) creating annual turnover of £6.7 million⁹. Spitalfields accounts for over 300 of these small and micro business employers. Meanwhile, industrial floorspace in the borough declined by 43% to 800,000m² between 2000 and 2012, above the Inner London average¹⁰. Employment is increasingly being focused in the service, retail and light industrial sectors.
- 6.2 Spitalfields' location in the City Fringe has created additional demand from larger corporate businesses spreading out from the traditional core locations in the City. The result has been to increase rents which has impacted the existing small businesses. As an example, the Fruit and Wool exchange contained over 100 small, local businesses but was forced to close because the building was redeveloped. It has since been replaced by a single corporate employer. The Tower Hamlets Employment Land Review¹¹ estimated that the pressure on the West of the Borough will only increase in time due to the new Crossrail station at Whitechapel and recommended taking decisive action to protect businesses which directly service the residential population, including trade counters, building supplies and car sales and repair garages together with associated local waste, recycling and transport uses.
- 6.3 Yet Spitalfields still has much diversity to its commercial activity. Brick Lane is home to a diverse mix of fashion, art, entertainment, retail and start-up businesses. The richness and complexity of the area's character today is due to many factors, not least the overlapping cultural legacy of three successive groups of immigrants, each of which has made a unique contribution to the area. These businesses are served predominantly from shops, pubs, restaurants and cafés at ground floor level, with offices, storage and residential uses above. The Truman Brewery now contains cultural venues, art galleries, restaurants, nightclubs, start-up spaces and shops. There are many clothing shops scattered through the area, with the rest of the mainly residential area also being home to some light industry, warehouse retail, art galleries, museums, health centres and educational buildings. 'Diversity' and 'vibrancy' are two words regularly used to describe the commercial feel of Spitalfields.
- 6.4 Testimonials from existing businesses and stakeholders in the area revealed the overwhelming concern was rising rents pricing small businesses out of the area¹². As a whole this was considered to be having a detrimental effect on the Spitalfields area, making it more generic. This was cited by all types of businesses, including retailers and restaurateurs, with an increasing number of chain retail stores occupying space in Brick Lane. For instance, a representative from the Brick Lane Restaurants Association said: "The rents are just creeping up, creeping up, every year and so are the rates now. I don't see a bright future for us restaurateurs, especially in Brick Lane". Similarly, a guide organising local walking tours said, "Rising rents...people [are] being priced out

⁸ Source: Tower Hamlets Local Plan 2019

⁹ Source: Office for National Statistics

¹⁰ Source: Peter Brett Associates (2016) *Tower Hamlets Employment Land Review*

¹¹ See footnote 9

¹² Commonplace (2019) *Spitalfields Commonplace Outreach Report 2018/19*

of the area and as a whole that [is] having a detrimental effect on the Spitalfields area and as the area becomes more generic, becomes less unique as a lot of smaller businesses and independents and creative people are forced out.”

- 6.5 Research conducted in 2017-2018 by the East End Trades Guild (EETG)¹³ with its Spitalfields members shows presently that 2 out of 4 businesses have had to close down or relocate due to the high rents. A second survey¹⁴ conducted in 2020 by the EETG with small and micro businesses in the Spitalfields area showed that 85% of respondents found it likely or extremely likely that they would have to relocate or close down their business in the next 5 years if nothing is done to provide more affordable workspace. Specifically, restaurants, cafes and shops struggled with increasing rents, as they paid on average around 24% of their turnover towards rent. Long-term commercial residents of Spitalfields that had traded in the area for more than 10 years, had on average experienced a rent increase of over 200% since moving to their current premises.
- 6.6 The impact of Covid-19 is expected to significantly exacerbate the above-mentioned issues. The survey conducted by EETG in 2020 found that 67% businesses in Spitalfields would have to dissolve or relocate their business if they were asked to re-start or continue paying the same level of rent as they did before the Covid-19 outbreak. Furthermore, 50% reported that this would force them to let go some of their employees. 69% of the respondents stated that it will most likely take them more than a year to return to normal levels of trading.
- 6.7 Clause 4 of Local Plan Policy D.EMP2 (New employment space) requires major commercial and mixed-use development schemes to provide at least 10% of new employment floorspace as affordable workspace. Paragraph 10.25 says that this space should be let at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years.
- 6.8 Draft London Plan Policy E3 (Affordable workspace) outlines that planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. It states that consideration should be given to the need for affordable workspace in areas identified in a local Development Plan Document where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises. An area where this applies is considered to be the City Fringe.
- 6.9 Given the high concentration of small and micro-businesses in Spitalfields, the Neighbourhood Plan considers that it is justifiable for this affordable workspace to be let at a cost which is at least 45% below the indicative market rental value at the time of letting. This reflects the need to be in general conformity with the Local Plan policy and the importance of addressing this issue in Spitalfields, a location rich in such business needs whilst also facing the pressure of high rents in a City Fringe location. Sensitivity tests conducted as part of the Local Plan Viability Assessment¹⁵ reported that the delivery of affordable workspace at 50% of the market rent was found to be

¹³ East End Trades Guild (2017-2018) *Affordable Business Rents*

¹⁴ East End Trades Guild (2020) *Spitalfields Neighbourhood Plan: affordable workspace and business mix*

¹⁵ BNP Paribas Real Estate (2017) *London Borough of Tower Hamlets Local Plan Viability Assessment*, for London Borough of Tower Hamlets

viable (paragraph 7.22), indicating that the affordable workspace policy in the Neighbourhood Plan can be feasibly implemented.

- 6.10 This policy approach is justified by the evidence base which supported the Borough Council's Local Plan Policy EMP2, clause 4¹⁶ which found that some major development schemes could viably support 10% of new employment floorspace at a 40% to 50% discount in market rental rates. It also has similarities to the approach in neighbouring Shoreditch, with a similar policy in the draft Hackney Local Plan (Policy LP29 – Affordable Workspace and Low Cost Employment Floorspace) for the Shoreditch Priority Office Area (POA). This was supported by a viability assessment of the policy¹⁷ which found that such a policy would still result in residual land values exceeding existing use values 'by a significant margin'¹⁸. The employment profile in Shoreditch is similar to Spitalfields, with both being in the City Fringe and subject to the strategic growth proposals in the City Fringe Opportunity Area, as well as the major investments such as Crossrail 2 that will attract new investment but also put pressure on rents, particularly for small and micro-businesses in the cultural and creative sectors which are the lifeblood of Spitalfields' economy.
- 6.11 A discount of at least 45% on the indicative market rent in the local area for a period of at least 12 years is therefore considered to represent an appropriate balance.
- 6.12 The affordable workspace should be secured in the usual way through legal agreement with the Borough Council. As advised in paragraph 10.25 of the Local Plan, applicants should work with the Council's Growth and Economic Development Service and recognised affordable workspace providers to determine the nature of the affordable workspace provision on a case by case basis. Applicants can manage the space either themselves or in association with a provider not included on an approved list, provided the terms can be agreed with the Council. In all cases, the applicant will be required to provide details of management arrangements as part of the planning application.

POLICY SPITAL7: AFFORDABLE WORKSPACE

As required by Tower Hamlets Local Plan Policy D.EMP2¹⁹ (New employment space), major development²⁰ of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace for a minimum of 10 years. In Spitalfields, this provision should be let at an affordable rate at least 45% below the Neighbourhood Area's indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).

¹⁶ Peter Brett Associates (2016) *Tower Hamlets Affordable Workspace Evidence Base*

¹⁷ BNP Paribas Real Estate (2018) *London Borough of Hackney: Proposed Submission Local Plan and Community Infrastructure Levy Viability Assessment*, for London Borough of Hackney

¹⁸ *Ibid.*, paragraph 6.26

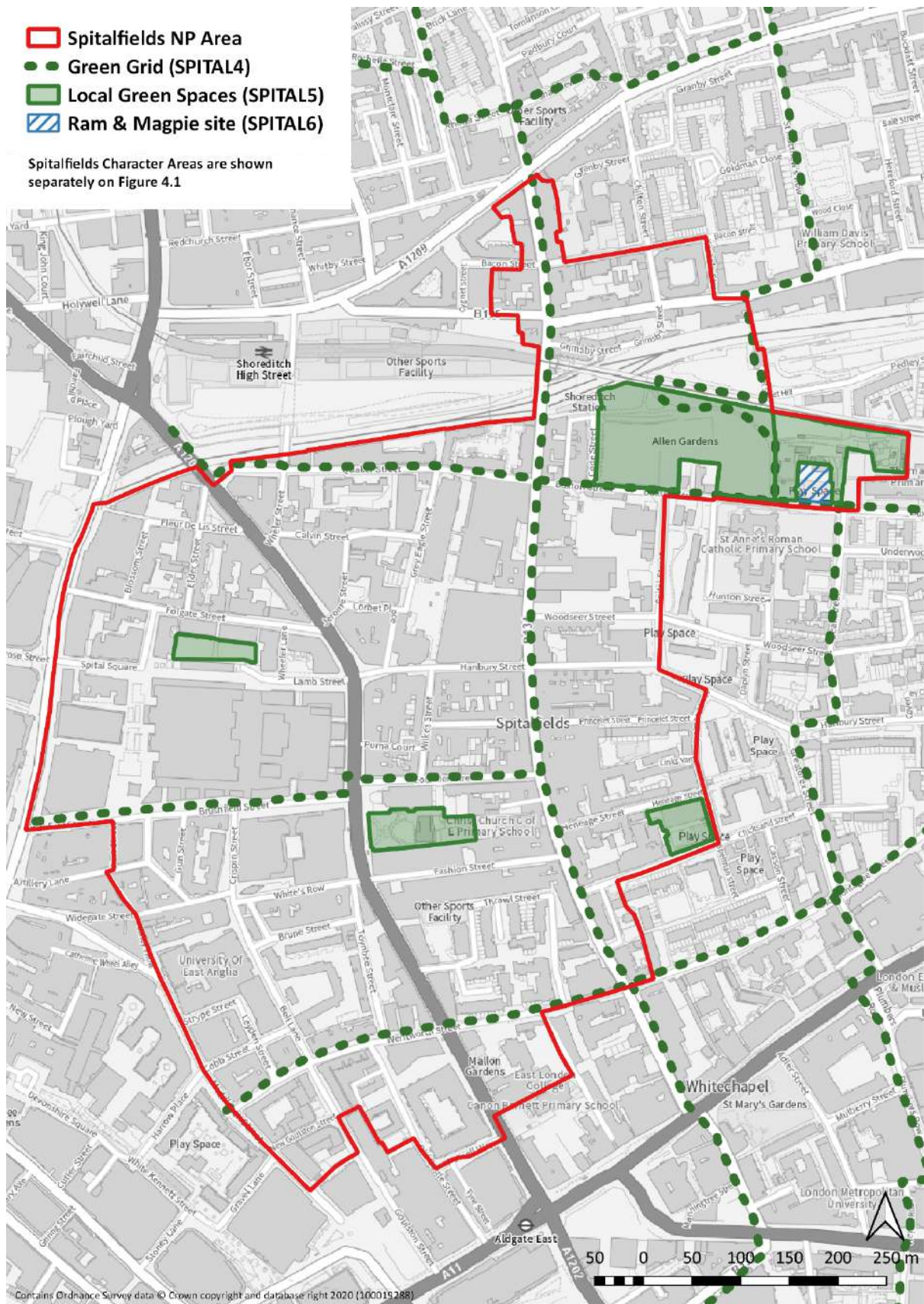
¹⁹ Clause 4

²⁰ 'Major development' is as defined in the NPPF

7 COMMUNITY INFRASTRUCTURE LEVY PRIORITIES

- 7.1 Tables 4.1 and 5.1 respectively provide lists of heritage and greening projects which are important to address the objectives of the Neighbourhood Plan. For the avoidance of doubt the projects are not listed in order of priority in either table. Similarly, for the avoidance of doubt there is no priority as between the urban heritage and urban greening projects. This represents the list of projects that the Forum considers should be able to use Community Infrastructure Levy (CIL) funding to address.

8 POLICIES MAP



APPENDIX A LOCAL CHARACTER AREA APPRAISALS

INTRODUCTION

1. The Spitalfields Neighbourhood Plan Area covers an area whose character and appearance is not uniform in terms of its built environment or its activities. In order to enable local context to be better understood and considered when evaluating proposals for change the Spitalfields Neighbourhood Plan Area has been divided into seventeen sub-areas called Local Character Areas, and the particular character of each is set out below.
2. Much of the Neighbourhood Plan Area lies within one of four conservation areas, designated by the local planning authority over the past fifty years. These all have their own Conservation Area Appraisals and Management Guidelines which have been adopted by the local planning authority between 2007 and 2009. The Local Character Area character appraisals below do not seek to duplicate or replace these, but simply to augment, clarify, specify in greater detail and update what they already contain.
3. Two of the conservation areas, Brick Lane/Fournier Street and Elder Street, have been subdivided into smaller Local Character Areas because of their diverse character. This is in line with the analysis already contained within the Conservation Area Appraisals and Management Guidelines.
4. Six of the Local Character Areas (L-Q) cover parts of the Neighbourhood Plan Area that are not within designated conservation areas. These nevertheless have elements of heritage significance which deserve recognition and protection where appropriate. They also sit close to conservation areas and other designated heritage assets whose setting is important to protect.
5. The analysis of these Local Character Areas does not mean that they should be considered in isolation. The boundaries often run down the centre line of a street where both sides of the road relate to each other. Clearly it is possible that proposals in one Local Character Area may have profound impacts on others, and not only at their boundaries.
6. The character appraisals seek to identify important townscape views in the area, and inevitably many of these medium or long vistas will be framed by buildings in different Local Character Areas, or run across the roof tops of other Local Character Areas.

A - Central



A1 This Local Character Area is arguably the core of the Spitalfields area. Within this grid of streets lies the most complete group of early 18th century houses in London and Nicholas Hawksmoor's Christ Church, one of Europe's finest Baroque churches, and a great landmark for the whole of Spitalfields. The streets of Local Character Area A comprised the first Conservation Area to be designated in the London Borough of Tower Hamlets as the Fournier Street Conservation Area in 1969, subsequently extended in 1978, 1998 and 2008, incorporating Brick Lane and much of the wider area, which are covered by Local Character Areas B, C, D, E, F and G.

A2 A substantial element of the very high heritage significance of this Local Character Area derives from its occupation by three successive groups of immigrants over a period of three hundred years, all of whom have left a rich cultural legacy, imbedded into the character and appearance of the area.

A3 The Brick Lane/Fournier Street Conservation Area Appraisal and Management Guidelines, adopted by the local authority in 2009, provide a very detailed account of the historic development of the area (pages 4-8) and there is detailed advice about how the houses of the Wood-Mitchell Estate should be cared for on pages 24-25.

A4 The majority of old houses in Fournier, Wilkes, and Princelet Street are now in residential use, and as the Management Guidelines state, this is the best way of preserving their remarkable historic fabric. This extraordinary enclave is, however, bounded by streets with much more varied land use. The west side of Brick Lane is part of the vibrant artery of Banglatown with its lively retail and restaurant uses. The south side of Hanbury Street also has a large number of non-residential ground floor uses, and fronts on to the south side of the Brewery complex (Local Character Area B). The east side of

Commercial Street is similarly lined with bars and food outlets from the Golden Heart public house on the corner with Hanbury Street to the Ten Bells public house at Fournier Street, and is part of a very active evening and weekend economy.

A5 The Local Character Area contains a very high concentration of statutorily listed buildings, several at Grade I and Grade II*, together with a few locally listed buildings. There are nevertheless a number of non-designated heritage features, including items of paving and street furniture, that have been identified and recorded in Appendix D.

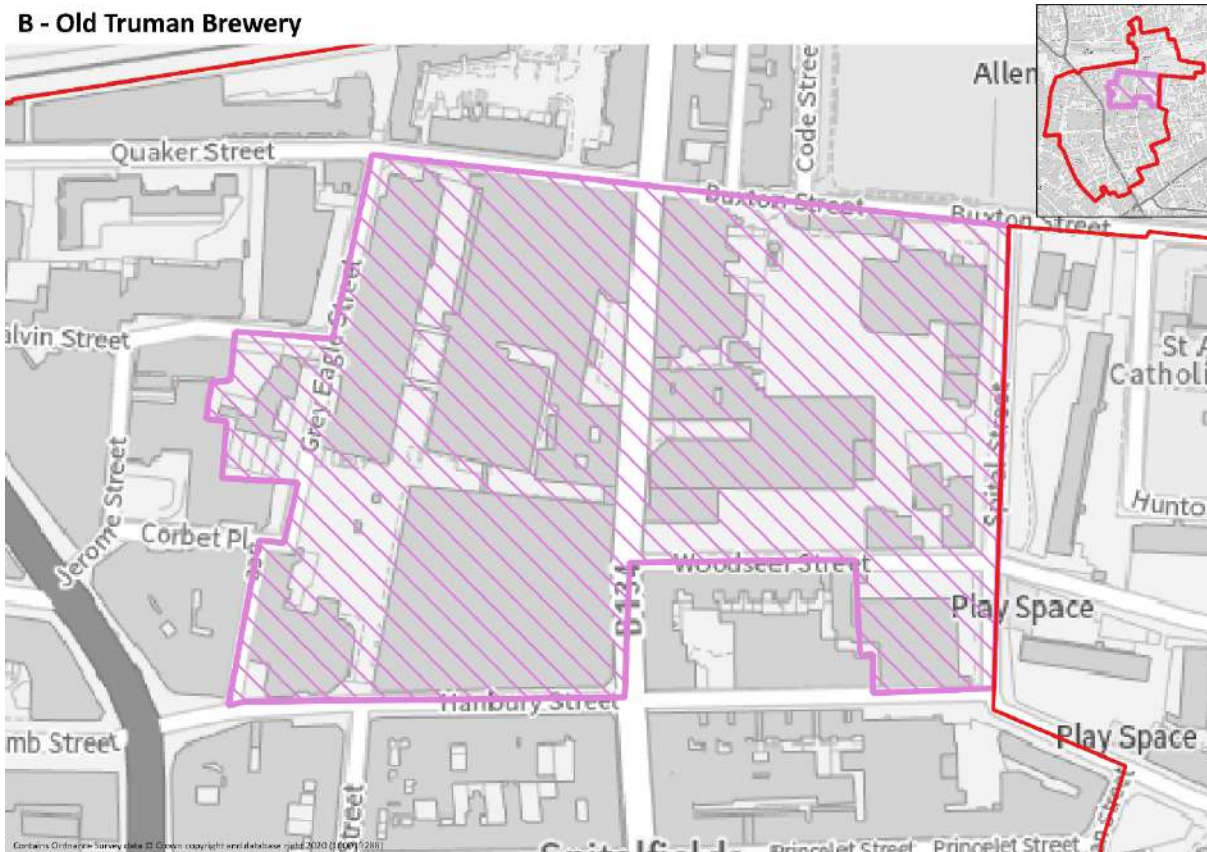
A6 Christ Church is a great landmark, and the existing Conservation Area Management Guidelines (page 19) state in general terms that views of it from publicly accessible places should be protected. The Guidelines identify the Mosque on the corner of Brick Lane and Fournier Street as a landmark and note important view eastwards along Fournier Street and in Brick Lane. For greater clarity these views from within Local Character Area A are described in more detail below. Views of Christ Church from outside Local Character Area A are described elsewhere in other Local Character Area character appraisals, but inevitably have implications for anything in the foreground or background of that view:

- along Fournier Street westwards from the junction with Brick Lane, with the spire rising above the roofs of the houses on the south side of the street
- view looking southwards down Wilkes Street from the junction with Hanbury Street towards the nave of the church
- the view from Brick Lane into Seven Stars Yard with Christ Church spire in the background
- the view eastwards down Fournier Street from the junction with Commercial Street, terminating in buildings on the east side of Brick Lane. The note of concern expressed on page 25 of the 2009 Appraisal about potential development in Brick Lane has happily been resolved by a new building of appropriate scale and materials
- a continuum of views of the Mosque on Brick Lane southwards from its junction with Hanbury Street and northwards from Fashion Street.

A7 A number of additional vistas and street views are also identified which contribute to the character of the Local Character Area, whose quality is vulnerable to alterations and extensions at roof level or new taller buildings. The following views are important and efforts should be made to protect them:

- Princelet Street from junction with Wilkes Street looking towards Brick Lane and beyond.
- along Princelet Street looking westwards from Brick Lane towards Wilkes Street (despite the glass blocks of Bishops Square in the background).
- along Wilkes Street from [junction of Fournier Street] northwards towards the Brewery.
- view through the gap between the church and vicarage in Fournier Street across the churchyard towards the rear of the buildings on the north side of Fashion Street.

B - Old Truman Brewery



B1 The complex of buildings either side of Brick Lane that comprise the site and works of the former Truman Brewery forms a distinct part of the Brick Lane/ Fournier Street Conservation Area with its own particularly character and appearance, very different from the early 18th century terraced houses of Local Character Area A, the tight streets of Local Character Area C or the narrow grain of Brick Lane north and south (Local Character Areas D and F). The buildings within the Truman Brewery are generally larger in grain and plot size. It should be noted too that the brewery complex does also span Grey Eagle Street, physically linked by a utilitarian bridge, with buildings of no architectural quality that are within Local Character Area C.

B2 This distinct quality of mainly industrial buildings is recognised in the Conservation Area Appraisal and Management Guidelines 2009, which also describe the historic development of the brewery, and the qualities of the principal brewery buildings that survive. The buildings within the Truman Brewery have been converted from their former brewing use to a variety of commercial uses.

B3 Several of the historic buildings on the brewery site are listed but there are other buildings and structures that contribute to the historic and architectural character and appearance of the area, and these have been included in Appendix D as assets of historical interest.

B4 Many of the brewery buildings relate strongly to the spaces in which they sit, and the quality of paving and surface treatment is crucial to the retention and potential enhancement of this character. The section of Brick Lane running through the brewery complex has been sympathetically treated. Historic materials and items of street furniture are particularly important and are included in the list

of non-designated heritage assets (see Appendix B), to be retained and carefully repaired and maintained.

B5 The area also includes a number of empty sites, such as former car parks or service yards, and utilitarian, 20th century buildings where there are opportunities for redevelopment or imaginative adaptation which will enhance the area and introduce more permeability into and through the brewery complex. Such opportunities for larger buildings need to consider their interface with adjoining Local Character Areas, such as North Brick Lane and St Stephen. The most sensitive perimeter interface is facing Woodseer Street, including the new residential block at 15 Spital Street because of the 19th century terrace of housing on the south side of the street.

B6 The area contains examples of world-renowned street art, sanctioned by the relevant building owners, which attract international and domestic visitors to Spitalfields.

B7 The Brick Lane/Fournier Street Conservation Area Appraisal and Management Guidelines recognise the Truman Brewery chimney as a landmark, and states that views of its from publicly accessible spaces should be protected. This includes certain key views from within Local Character Area B, where it is sometime seen in close proximity to other brewery buildings, but also because of the chimney's height there are views from further afield, including Local Character Areas C, E and F.

B8 The following views and vistas within the Local Character Area are considered important and efforts should be made to protect them:

- view from Brick Lane under the bridge looking north.
- view from Brick Lane looking westwards under the arch into the brewery yard (although it is acknowledged that this can be closed off by security shutters).
- view from the north end of Wilkes Street in Hanbury Street looking northwards through to Quaker Street (although it is acknowledged that there is an extant planning permission for the erection of a replacement bridge between buildings along this view).
- from Brick Lane near Buxton Street looking south towards the chimney.

C - St. Stephen



C1 This Local Character Area, bordered to the north by the railway line, to the east by the main Brewery complex, and to the south-west by the diagonal Commercial Street, contains much of its street plan from the 17th century, if few of its original buildings. Many of its streets, such as Calvin Street, Corbet Place and Grey Eagle Street, are very narrow, and not to a strict grid plan. There is an intimacy and sense of labyrinth that is not found elsewhere in the straight orthogonal layout of the 18th century streets. To some extent this Local Character Area feels ‘cut off’ from its surroundings by the railway to the north, the long brewery buildings to the east of Grey Eagle Street and the large commercial buildings facing Commercial Street. A virtually continuous wall of five/six storey housing has recently been built along the north side of Quaker Street, including Sheba Place, providing at least a form of barrier to the railway and the Bishopsgate Goodsyrd site to the north.

C2 A small part of the Local Character Area does include a short stretch of Brick Lane, including the new Sheba Place development on the west side and three storey (plus dormer) terraces on the east side, all with ground floor shops. This section is far more akin to Local Character Areas D and F in terms of scale, grain and land use. It also includes the 1990 Daniel Gilbert House, along the western side of Code Street, overlooking the park.

C3 In the area west of Grey Eagle Street, although there are isolated groups of buildings with small grain and a three storey scale, much of the development is larger in scale, both in terms of heights of five and six storeys and with expansive footprints. The brewery does in fact straddle both sides of the road, linked by a modern bridge. Those historic buildings that do survive seem particularly vulnerable in this area and great care must be taken to protect their setting. There are a number of empty sites where sensitive development is highly desirable, to help repair the area and reinforce its historic sense

of enclosure. Together with the adjacent brewery site this area offers great opportunities for positive investment.

C4 The imposing Art Deco five storey London County Council flats, built in 1930 along the south side of Quaker Street are set back from the historic street line, but is probably an example of where the exception proves the rule. Some other post-war developments have disregarded historic street lines in a far less satisfactory manner, possibly anticipating road widening schemes that have now been abandoned. Reinstatement of historic building lines and the maintenance of the existing street pattern is essential to the protection and regeneration of this area.

C5 There is a mix of land uses in the area, but generally not of the fine grain found in Brick Lane. There are a number of sizeable blocks of new flats together with large commercial buildings, notably along Commercial Street, and very little retail or restaurant uses.

C6 The size and solidity of many of the buildings, coupled with the narrow streets, gives this Local Character Area a gritty, hard-edged and unrelieved urban character, which is possibly the most challenging in terms of regeneration in the whole of the Spitalfields area.

C7 The Local Character Area contains a number of listed buildings but there are several others which do contribute positively to the historic and architectural character and appearance of the area which are worthy of recognition. Some features such as the bridge across the road in Jerome Street add enormously to the industrial character of these streets. These are included in the list of assets of historical interest in Appendix D.

C8 Pavement and road surfaces in this area are generally poor and have often been badly repaired or patched following construction works. However, some historic road surfacing, paving and street furniture survives, also noted in Appendix D, which are worthy of being retained, restored where damaged and kept in good repair. Historic granite setts survive in the carriageway beneath modern tarmac in many streets.

C9 The existing fragmented and sometimes scarred nature of the area means that there are few 'picture postcard' views within the area. The close view of the red brick warehouse on the north side of Calvin Street from the dog-leg junction with Jerome Street gives a flavour of the 19th century. By contrast the vista along Calvin Street from Grey Eagle Street, despite interesting buildings on either side is marred by the foreground and the staggering height of Principal Place in the distance. The narrow view of the tall red brick chimney on the west side of Jerome Street from its eastern corner with Corbet Place is a striking reminder of the industrial past.

C10 Two good views of Christ Church exist from within the Local Character Area, as follows, and efforts should be made to protect them:

- from the junction of Jerome Street and Commercial Street looking south towards Christ Church.
- from the north-south section of Corbet Place looking towards Hanbury Street with the spire of Christ Church rising behind.
- view of the brewery chimney looking southwards from Brick Lane from south of the railway bridge, particularly from the west pavement.

D - North Brick Lane



D1 This Local Character Area forms a distinct part of the Brick Lane/Fournier Street Conservation Area, north of the railway line and its modern railway bridge which forms a strong visual and physical barrier to the rest of the CA to the south. The Conservation Area Appraisal and Management Guidelines provide a very good description of the historical development of the area and its character and appearance.

D2 The overriding quality of this Local Character Area derives from its consistency of scale of three and four storey buildings, a grain of narrow frontages facing narrow streets, with very few large building plots. There are consistent and continuous street lines, with everything built hard onto the back edge of pavement. Where new development has occurred within the area, such as sections of Cheshire Street, it has been done to an appropriate scale of plot widths, heights and architectural rhythm, and using traditional materials of brick and timber. While some of the old buildings have been lovingly restored there remain many further opportunities for more careful and imaginative refurbishment projects.

D3 The historic shabbiness of this part of Brick Lane has been partly replaced by fashionable retail outlets and vibrant shops selling food and clothing. The weekend market continues to thrive, drawing people from far and wide, but the weekday and evening economy is also thriving. This vibrant activity and mix of lively ground floor uses in Brick Lane and its side streets is crucial to the character of this Local Character Area.

D4 The Local Character Area contains a number of statutorily and locally listed buildings, but not the density or concentration of Local Character Areas A or B. These streets do however contain a great

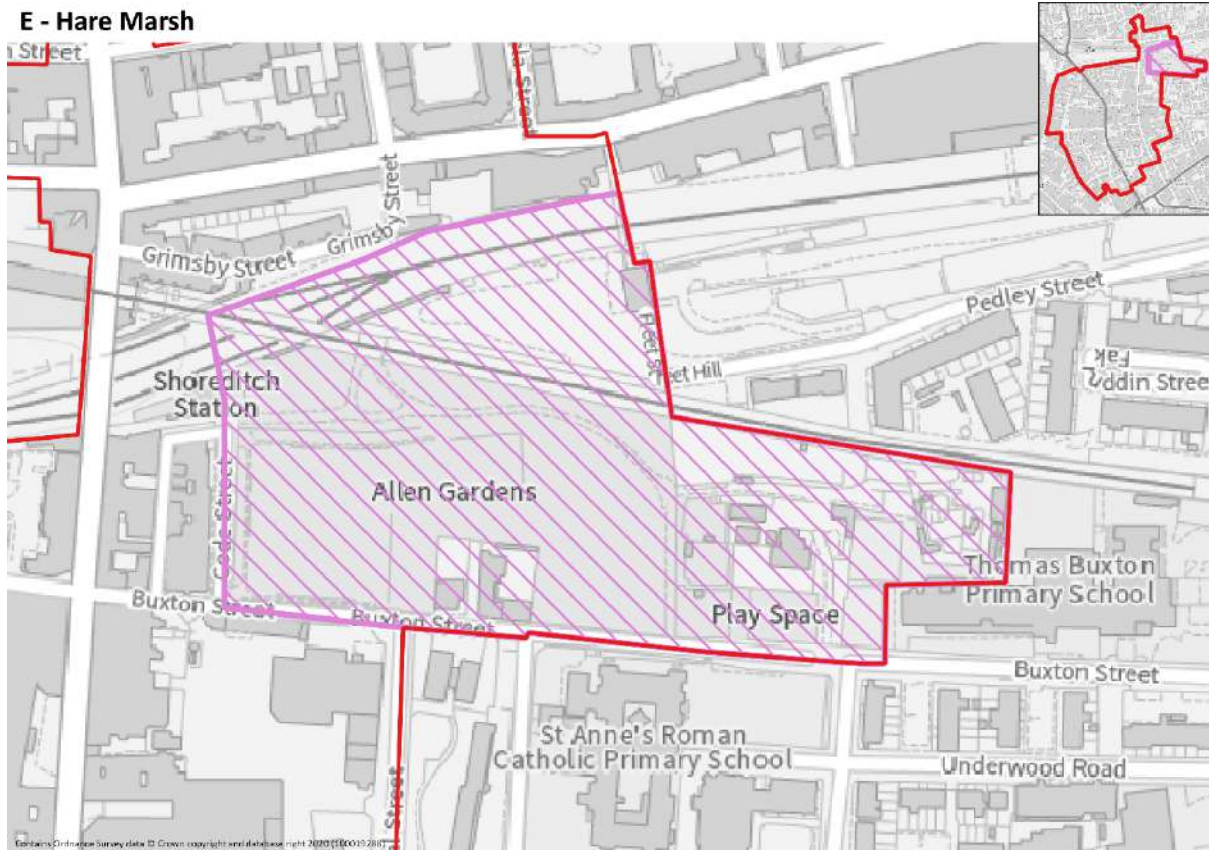
wealth of historic fabric, previously overlooked perhaps because of its condition and the assumed poverty of the area. While the Conservation Area Appraisal in 2009 correctly noted that many of the buildings on Brick Lane north of Sclater Street and Cheshire Street are thought to be mid-18th century tenements behind rebuilt 19th century facades, and potentially worthy of listing, that status has not yet been achieved. One locally listed building, No.17 Cheshire Street, has been lost to redevelopment. No.161 Brick Lane, mentioned in *The Buildings of England* in 2005 has also been lost. Although the Conservation Area Appraisal does mention a few other buildings of interest such as No.157, formerly the Jolly Butcher public house, they were afforded no status in 2009. Many of the old buildings in this area, even though altered or partly defaced, tell a story of social history and adaptation over centuries of occupation, all of which contribute positively to the character and appearance of the area. They have been included in the list of non-designated heritage assets in Appendix B.

D5 The existing Conservation Area Appraisal notes several views that should be protected, but none are specified in detail for this Local Character Area. Views westwards along Bacon and Sclater Streets and along Bethnal Green Road have been greatly changed by the overwhelming scale of recent development west of Cygnet Street, and this adverse impact could be exacerbated by excessive development of the Bishopsgate Goods Yard.

D6 The following views are important and efforts should be made to protect them:

- the continuous and consistent height of buildings along Brick Lane, coupled with the variety of architecture, provide a continuum of townscape views looking north from the railway bridge towards Bethnal Green Road, and in the opposite direction from Bethnal Green Road, looking down into Brick Lane. The even roof lines are an important component of this view.
- Cheshire Street, looking eastwards from the junction with Brick Lane, is lined by interesting buildings particularly on the south side and provides a fine view, enhanced by the consistent roof lines and the distant bend in the street which is an invitation to explore.

E - Hare Marsh



E1 The vast majority of this Local Character Area comprises Allen Gardens which is a major public open space and amenity for local residents and workers. Two important buildings remain on Buxton Street, the vicarage which is listed and the former school which is not but is included on the inventory of assets of historical interest in Appendix D.

E2 Within and alongside the public open space there are also physical reminders of the historic streets that once covered this area. Fragments of original granite sett carriageways and kerb lines survive, and the layout of footpaths sometime follows the line of ancient streets. These are important reminders of the past. As meaningful survivals of historic fabric they have been included as Non-Designated Heritage Assets in Appendix B.

E3 The area contains examples of street art which attracts international and domestic visitors to Spitalfields. Street art and other painting on the garden walls around 35-37 Buxton Street should be discouraged because of the harm toxic water run-off may be causing endangered amphibians that live nearby.

E4 As one might expect from a large open space, there are fine views in many directions, but from within the park and along Buxton Street the Truman Brewery chimney is a prominent landmark. Any development of empty sites on the eastern part of the brewery site will need to ensure that these views are carefully considered.

F - South Brick Lane



F1 South of the brewery complex, Brick Lane is the busy and narrow artery of Banglatown. As noted by *The Buildings of England* (2005), it has a great deal of character but little that stands out architecturally. Built up tightly to the street (not with projecting shop fronts or set-back upper floors) from the late 17th and early 18th century, much was rebuilt in the late 19th or early 20th century, maintaining a broadly consistent scale of around four storeys, with projecting dormers in mansard or sloping roofs. The grain of Brick Lane is of narrow plots and individual shops, with very few buildings with large footprints or wide frontages. Despite few of the buildings being statutorily or locally listed, there is a wealth of historic fabric, often with a patina of alterations that tell their own stories of social and cultural change.

F2 To the east, the tightly-knit side streets provide a wider range of building types, from the two storey (plus dormers not always visible from the street) terraced houses of Woodseer Street to grand Edwardian tenements and impressive workshop and factory buildings, some with wider and more unified frontages. These display a great range of architectural styles and detailing.

F3 Those buildings that are not already listed but which nevertheless are considered to make a positive contribution to the character and appearance of the area are included in the inventory of non-designated heritage assets in Appendix B.

F4 Land use is also crucial to the character of the Local Character Area with a vibrant mix of small retail and restaurant businesses lining Brick Lane, and occasionally spilling into side streets. Generally the character of the side streets is much quieter, with more residential uses and office or studio uses. The contrast between Brick Lane and its side streets is particularly important.

F5 The Conservation Area Appraisal mentions various landmarks including the Great Mosque, the Truman Brewery, and the striking 1984 Health Centre further south. The gently curving nature of Brick Lane and its consistent scale and building line results in a continuum of townscape views from all along the street, in both directions, with the various landmarks in the near, medium or far distance. Many of the junctions with side streets have buildings which celebrate their corner positions. The Appraisal notes that many of the side streets are straight and offer long views from Brick Lane to the east, framed by buildings of generally consistent heights. In these views the rooflines are important and proposals which affect these should be carefully considered. There are shorter yet tantalising views into Links Yard from Spelman Street, across the granite setts in the entrance courtyard of the former industrial buildings behind, and an even better view of the splendid 19th century brick chimney within Kinks Yard from the yard behind No.33 Heneage Street.

F6 The following views are considered important and efforts should be made to protect them:

- along Brick Lane in both directions for its full length, southwards from the junction with Woodseer Street and northwards from Wentworth Street/Montague Street.
- from Brick Lane eastwards along Heneage Street.
- from Brick Lane looking eastwards along Princelet Street.
- from Brick Lane looking eastwards along Hanbury Street.
- from Brick Lane looking eastwards along Woodseer Street.
- from Spelman Street into Links Yard, including the top part of the spire of Christ Church.
- from rear of Heneage Street to chimney of Links Yard.

F7 The quality of street and pavement surface varies through the area, with some parts recently repaved in good quality York stone while other parts are more utilitarian. Exposed granite setts remain in Heneage Street and in several pavement crossovers. These are included in the inventory of Appendix D, with the intention that they are retained and kept in good repair. The historic street furniture is identified as a series of non-designated heritage assets and is also shown in Appendix B.

G - Old Market



G1 The former wholesale fruit, vegetable and flower market together with the former Fruit and Wool Exchange form a distinctive part of the Brick Lane/Fournier Street Conservation Area. Its character and appearance is described on pages 8 and 9 of the Conservation Area Appraisal and Management Guidelines 2009.

G2 In 2018 the Fruit and Wool Exchange site was redeveloped, incorporating the former car park in White's Row, but also involving the loss of the historic Dorset Street. While the 1929 frontage to Brushfield Street has been retained and adapted, the character of the former exchange has now changed to one of a corporate office building with an element of ground floor retail uses. A new pedestrian route has been created from the central entrance in Brushfield Street to White's Row, but the semi-public space in the centre is dark and little more than an entrance to the offices.

G3 The additional floors of offices, although set back from the street frontages, do impinge of various longer views, for example along Commercial Street (see Local Character Area K).

G4 North of Brushfield Street, the former wholesale market, as converted in the 1990s, remains a major attraction for visitors to the area. Its scale and frontages on to Commercial Street are entirely appropriate for the area. The Conservation Area, and therefore this Local Character Area, does not include the two storey 1929 neo-Georgian range along the north side of Brushfield Street (see Local Character Area L).

G5 The old market buildings are nationally listed, but there are a number of other features that have been identified which contribute positively to the character and appearance of the Local Character Area. Much of the paving in the area has recently been renewed in good quality materials, but some

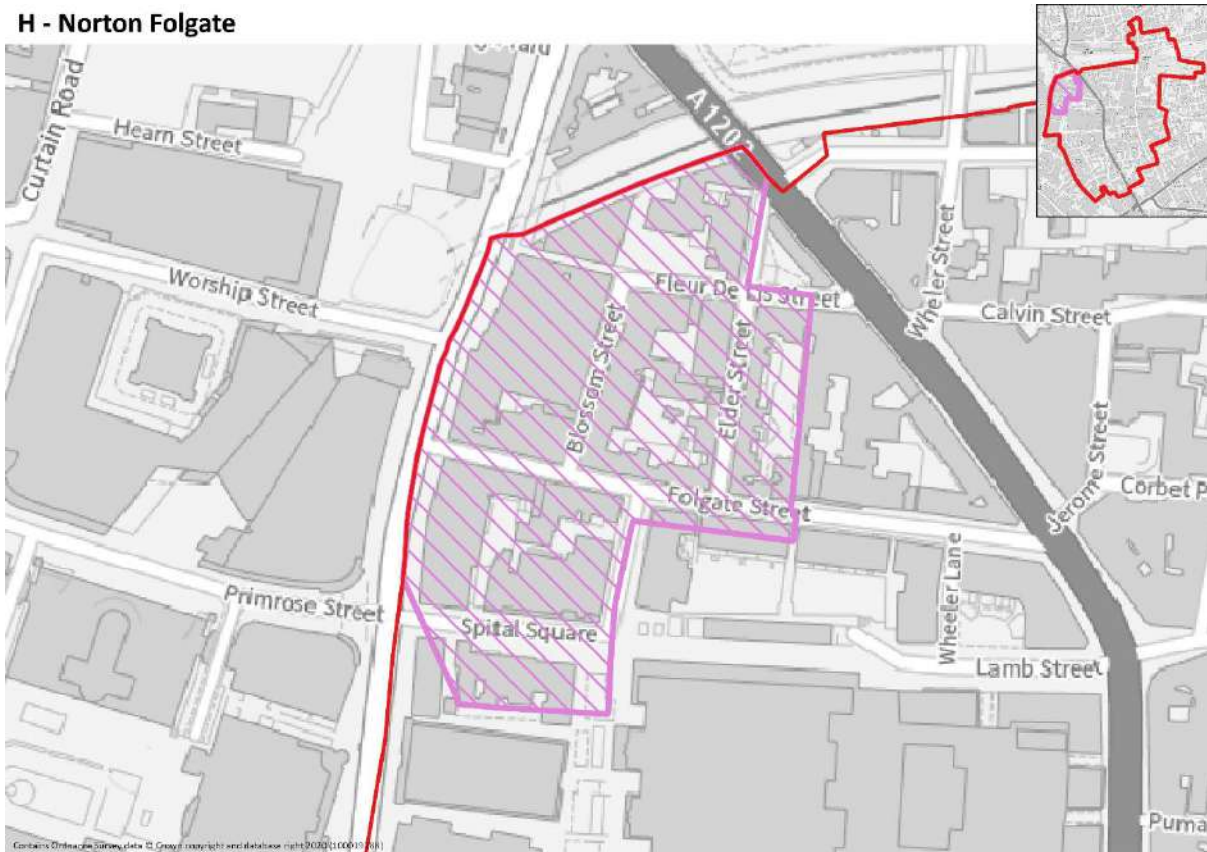
items of historic street furniture remain. These are included in the list of assets of historical interest at Appendix D.

G6 The view of the spire and west end Christ Church along the full length of Brushfield Street is already identified in the Conservation Area Appraisal, and both the old market buildings and the former Fruit and Wool Exchange are in the near foreground of this view. Any increase in bulk or upward extension, including visible roof plant or antennae, is likely to be harmful to this view.

G7 An addition view has been identified from the wide pavement along the eastern side of the former Fruit and Wool Exchange, between Brushfield Street and White's Row, of the wider setting of Christ Church, its west end and tower, and the south side of the nave, but also including its church yard and the backdrop of early 18th century houses in Fournier Street. This is one of London's most outstanding pieces of townscape and efforts should be made to protect it.

G8 The view of Christ Church also carries on northwards for the full length of Commercial Street along the pavement outside the old market building from Lamb Street to Brushfield Street. This is a continuous view where the spire rises above the parapets of the buildings on the east side of Commercial Street, in Local Character Area A, and highly sensitive to any roof top alterations or extensions. Again, efforts should be made to protect this view.

H - Norton Folgate



H1 This Local Character Area comprises about two-thirds of the Elder Street Conservation Area, designated by the local authority in 1969. The Conservation Area Appraisal and Management Guidelines adopted in 2007 contain a thorough description of the history of the area and its character and appearance at that time. Since then, however, much of this part of the Conservation Area has been radically altered and the historic character affected by the implementation of British Land's proposals for redevelopment (which was refused by Tower Hamlets Council but which was subsequently approved by the Greater London Authority). The area between Blossom Street and Norton Folgate/Shoreditch High Street has been largely demolished, to be replaced by much taller modern offices. A number of facades have been retained. As the 2007 Appraisal noted on page 7, the Nicholls and Clarke site "represents a glimpse of the interwoven complexity often found in old London, and may include walls and other structures from the former Hospital Priory".

H2 While the listed early 18th century terraces of Elder and Folgate Streets survive, their setting will be altered by the height and bulk of new buildings, and their setting will be threatened by large scale developments and proposals to the west and north.

H3 Spital Square is an important enclave in the south-west corner of the area, with significant listed buildings. The setting of these buildings, particularly St Botolph's Hall, has been improved by the new 20 Bishops Square, by Matthew Lloyd architects, completed in 2009. It won an RIBA award in 2010. Its five-storey scale and warmly coloured terracotta are appropriate for its context, and a welcome contrast to the uncompromising office blocks in Local Character Area L. Eden House on the north side of Spital Square, built in 2008, also is five storeys. Anything higher would have an adverse impact on

the houses in Folgate Street and development must therefore avoid or demonstrate that it can fully mitigate any such impacts.

H4 An existing oddity is that the boundary of the Conservation Area, and hence the boundary between Local Character Areas H and L, runs at a diagonal, cutting through existing buildings. While this may reflect ancient boundaries of the liberty of Norton Folgate, it might be more sensible to amend the boundary to run along the centre line of Stothard Place from Bishops Square to Bishopsgate.

H5 There is a variety of land uses within the Local Character Area, with most streets containing a mix of uses within them. This variety is part of the character of the area and enhances the grain and sense of diversity in the area. Large scale monolithic uses are not appropriate, and the retention of small-scale services interspersed between residential and business accommodation is important.

H6 While many buildings in the area are listed there are a few that are not but which nevertheless contribute positively to the character and appearance of the area. These additional buildings, including the facades retained in Blossom Street and Norton Folgate are presented in Appendix D as assets of historical interest.

H7 Much of the area has been repaved in good new materials and some of the historic street surfaces are already listed. There are however some features of street furniture not currently listed. These have been identified and included as assets of historical interest in Appendix D. Ideally they should be retained in situ and properly maintained.

H8 The 2007 Conservation Area Appraisal mentions various important views within in the area, and notes on page 8 that the character of the area has been altered by the 12 storey Bishops Square and the 35 storey Broadgate Tower, which was under construction at the time of publication. These views are described and updated in greater detail below but, for avoidance of doubt, are required to be protected through the 2007 Conservation Area Appraisal rather than this Character Area Appraisal and Policy SPITAL1:

- the view northwards up Blossom Street from the junction with Folgate Street will certainly be changed by the new British Land development, and may no longer give the “ dramatic and accurate glimpse of mid 19th century commercial London, including the warehouses, loading gateways, gas street lights, bollards and road setts” that the Conservation Area Appraisal described in 2007.
- the view southwards along Elder Street from its junction with Commercial Street, and continuing south of Fleur-de-Lis Street remains framed by historic buildings and the neo-Georgian frontage of Loom Court. The view is closed by the facsimile Georgian facades of Folgate Street, with the glass blocks of Bishops Square rising behind. This view appears on the cover of the Conservation Area Appraisal.
- the view northwards up Elder Street from its junction with Folgate Street is similarly lined with historic buildings of consistent parapet height, looking towards the low brick walls of the railway cutting on Commercial Street and warehouses of Shoreditch in the distance. It will be particularly affected by any large developments at the western end of the Bishopsgate Goodyard.

- the views westwards along Folgate Street and Fleur de Lis Street are already dominated by the very tall buildings in the City and Hackney, now including Principal Place and Curtain Street towers.
- the most unaltered views remaining today are eastwards along Folgate Street and Fleur-de-Lis Street towards Commercial Street, framed by buildings in Local Character Area I.

I - Commercial Street



I1 This triangular-shaped Local Character Area is dominated by the industrial and commercial buildings fronting the south-west side of Commercial Street, which cuts as a diagonal through the historic grid plan of Elder, Fleur-de-Lis and Folgate Streets. The scale of buildings is mainly five or six storeys, with wide and grand frontages, matching the scale of buildings on the other side of the street in Local Character Area C.

I2 The north and south sides of Folgate Street comprise pastiche late-20th century redevelopment.

I3 Most of the area has been repaved with appropriate materials, including York stone, and historic carriageway setts survive in Folgate and Elder Street. Items of historic street furniture or materials are not protected by listing, but nevertheless are worthy of note and are therefore included on the list of assets of historical interest in Appendix D.

J - Artillery Passage



J1 This Local Character Area corresponds exactly with the Artillery Passage Conservation Area which was designated by the local planning authority in 1973 and extended to its current boundaries in 1975. Both the character and appearance of the area are very well described in the Conservation Area Appraisal and Management Guidelines adopted by the local authority in 2007. Its recommendations should be adhered to and will be supported by the Neighbourhood Plan. The tightly-knit nature of the area with its narrow streets and passageways, its low scale of three and four storey buildings and fine grain of small plots and narrow frontages makes this area very susceptible to harm from extensions to buildings or redevelopment within the area or nearby.

J2 In addition to the statutorily and locally listed buildings already identified, a number of non-designated heritage assets have been recognised in Appendix D, all of which contribute positively to the character and appearance of the Conservation Area. These should be retained. As well as buildings the list also includes items of street furniture.

J3 Much of the area has been repaved in recent years with sympathetic materials, particularly York stone flags and granite kerbs, which is welcome. However special care must be taken to retain historic features such as bollards where they survive, which are also included in the inventory of Appendix D.

J4 With regards to the views identified on Page 8 of the Appraisal, these are clarified as follows but, for avoidance of doubt, are required to be protected through the 2007 Conservation Area Appraisal rather than this Character Area Appraisal and Policy SPITAL1:

- the view towards Christ Church extends the full length of Brushfield, almost from Bishopsgate, west of the Local Character Area. All the frontages and roof lines of buildings on Brushfield Street

frame this continuous view, including buildings in Local Character Area G and L. The two set-back floors on the new Bishops Court development have a negative impact on this view. Any further upward extensions which impinge on the view should be resisted on any properties in Brushfield Street.

- the views along Artillery Passage apply to both directions, looking eastwards from Sandys Row and westwards from Artillery Lane.
- the view of No.56 Artillery Lane from the junction with Gun Street is now dominated by the Nido Tower of 100 Middlesex Street, south of Frying Pan Alley.
- the views into and within Parliament Court are remarkably intimate, including a glimpse of the rear of the Sandys Row Synagogue, and require careful protection.
- there is a continuum of views along Crispin Street from its junction with Artillery Lane and White's Row towards old Spitalfields market, albeit with the glass block of Bishops Square rising behind the Brushfield Street frontage.

J5 The following additional views are of merit and therefore efforts should be made to protect them:

- looking southwards from Brushfield Street down Steward Street towards the cupola of No.44 Artillery Lane.
- looking south from Crispin Street outside the Convent of Mercy towards Bell Lane, Tenter Ground and White's Row.
- looking eastwards along White's Row towards Commercial Street, and continuing down Fashion Street to Brick Lane (one of the longest views in the whole of Spitalfields).

J6 It should be noted that Bishops Court, mentioned on Page 7 of the Appraisal has now been redeveloped, although this is considered to be at rather too great a scale despite the existence of the Management Guidelines.

K - Wentworth Street



K1 This Local Character Area corresponds exactly with the Wentworth Street Conservation Area, designated by the local authority in 1989. The character and appearance of the area, including its historical development, are very well described in the Conservation Area Appraisal and Management Guidelines adopted by the local authority in 2007.

K2 The 2007 Appraisal suggests two component parts for the Conservation Area, one based around Wentworth Street market and the other around Commercial Street. However in terms of building types, the magnificent row of commercial buildings along the east side of Middlesex Street (all built following the road widening by the Metropolitan Board of Works in 1883) are similar in scale and character to the fine ranges of industrial, workshop and warehouse buildings that line both sides of Commercial Street. In between these western and eastern boundaries the area is dominated by inter-war London County Council residential development of the Holland Estate, incorporating ground floor shops along Wentworth Street. These robust blocks of public housing line the majority of both sides of Wentworth Street and dominate the townscape. The side streets, including the long streets of Bell Lane and Toynbee Street and the grid of shorter side streets such as Cobb, Leyden and Strype Streets, contain a wider variety of buildings from the 19th and 20th centuries, generally smaller in scale, but built hard on to the streets with no set-backs.

K3 In terms of character and land use the street market and clothing industries, together with their plethora of shops and showrooms, have traditionally dominated Wentworth Street and Middlesex Street. The side streets are quieter, with less ground floor activity, and this contrast is important to the character of the area.

K4 Very few buildings in the Local Character Area are statutorily or locally listed. The Conservation Area Appraisal 2007 specifically mentions a few other buildings, such as the Bell public house on Middlesex Street, which contribute positively to the character and appearance of the area. However there are a great many more which deserve recognition for the role they play in defining the character and appearance of the area and its historic development. Some of these are considered to merit inclusion in the list of non-designated heritage assets in Appendix B and the remainder that are simply worthy of note are included in the list of assets of historical interest in Appendix D.

K5 In recent years there has been welcome investment in refurbishing several important buildings in the area, such as Nos 9-23 Leyden Street and No.80 Middlesex Street, which are exemplary. Where new development has occurred such as the extensions of the 1930s Brody House between Leyden Street and Bell Lane, this has generally respected the character of the area. Great care however must be taken not to increase the scale of existing buildings by upward extensions in a manner that will harm the existing, consistent scale of the townscape. Development must therefore avoid or demonstrate that it can fully mitigate any such impacts.

K6 The 2007 Appraisal describes a number of important townscape views in the area. These are clarified as follows (for avoidance of doubt, these are required to be protected through the 2007 Conservation Area Appraisal rather than this Character Area Appraisal and Policy SPITAL1):

- view southwards down Commercial Street from the junction with White's Row and Toynbee Street, with a consistent scale of buildings and parapet height, sensitive to any roof extension.
- views northwards up Commercial Street from its junction with Wentworth Street, on both sides of the street, with fine sequences of buildings of consistent heights. The bulky additional storeys on the Fruit and Wool Exchange have impacted on these views, and from the east side of the street the towers of Principal Place, Curtain Road and Broadgate also dominate what was once a fine view. Nevertheless there must be sensitivity to any roof extensions on the buildings in the Local Character Area which might further erode the townscape.
- view westwards along White's Row from the north end of Toynbee Street, although this is somewhat dominated by the glass blocks of Broadgate in the background. The new three storey frontage of the Fruit and Wool Exchange development now provides welcome enclosure to the north side of White's Row along the eastern half of the street. This view reflects the vista eastwards from the other end of White's Row (see Local Character Area J).

K7 The following additional views are of merit and therefore efforts should be made to protect them:

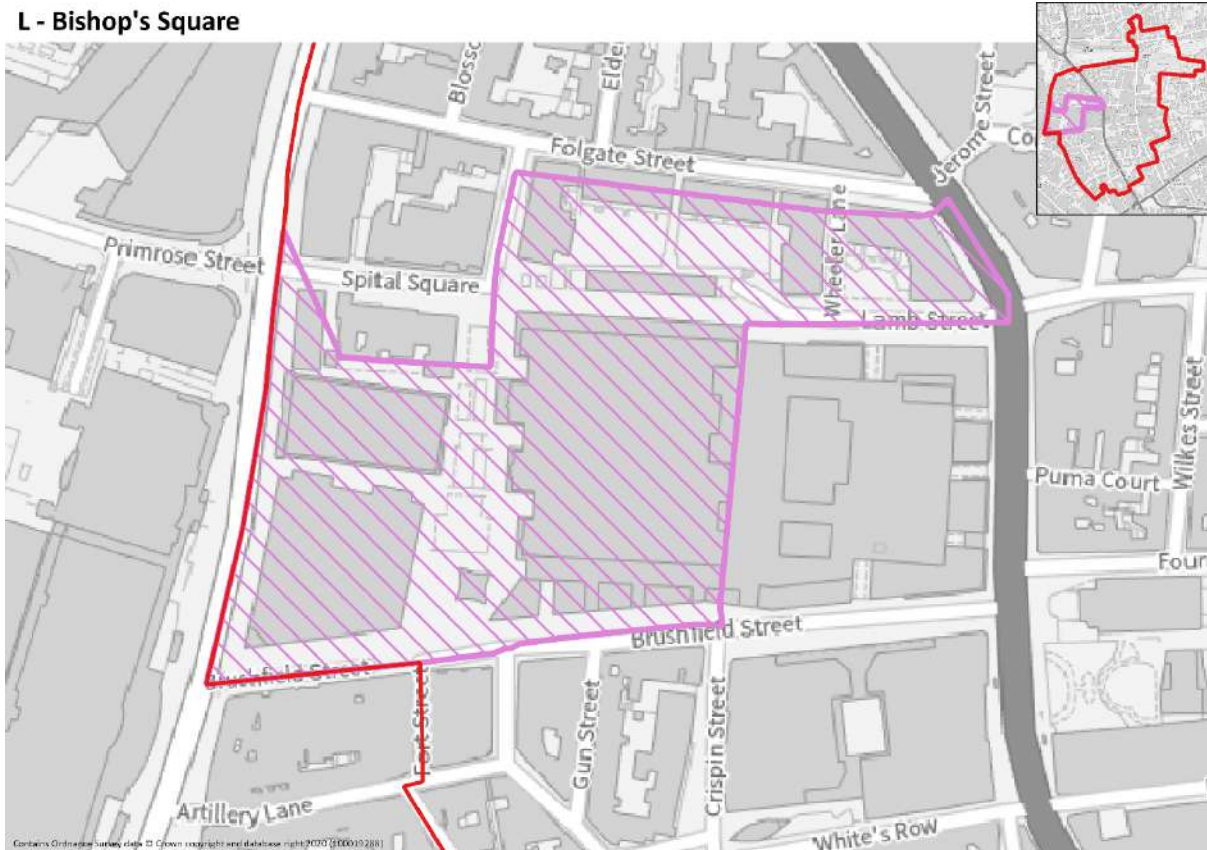
- looking north from the southern end of Toynbee Street at its junction with Wentworth Street towards the upper part of spire of Christ Church.
- view eastwards along the full length of Fashion Street from Commercial Street towards Brick Lane.
- view from Wentworth Street looking north into Ann's Place and beyond; an atmospheric glimpse of historic 19th century Spitalfields.

K8 The Conservation Area Appraisal notes that the high-rise Denning Point tower "overshadows" the fine warehouse buildings on Commercial Street close to Wentworth Street. The same can be said of the new Nido Tower to the north, between Bell Lane and Middlesex Street, similarly outside the

conservation area but impacting on it in an adverse manner. Perhaps the most dramatic demonstration of contrasting scale, and the cheek-by-jowl proximity of economic wealth in the City of London to the comparative poverty but historic continuity of this part of Spitalfields, is the panorama looking westwards along Wentworth Street, where the City's cluster of 21st century office towers rise in spectacular fashion over the 19th and 20th century rooftops.

K9 Much of the area in and around the market has been repaved in recent years with good quality materials, including new York stone and granite kerbs, which is welcome. However, great care must be taken to retain the few historic features which survive. The tightly-knit and hard urban character of the area together with its land uses means that there are few trees or green spaces, but those that exist are an important foil to the built fabric. There are proposals to make a new 'pocket' park on the site of the disused public conveniences at the south end of Leyden Street. If possible the existing vent shaft and the historic bollard on the existing island should be retained.

L - Bishop's Square



L1 This comprises the largest Local Character Area which does not have conservation area status. Most of it was subject to comprehensive redevelopment whose planning started in the 1980s when the area was still within the demise of the City Corporation (before the boundary changes of 1994). The large-scale steel and glass office blocks of Nos 250 and 280 Bishopsgate, completed in 2000/1, relate far more closely to the financial quarter of Broadgate and London Wall than to the character of Spitalfields. Only the five-storey scale of No.288 Bishopsgate, by Foggo Architects, pays any respect to the scale of the adjacent Spital Square in Local Character Area H.

L2 The largest development however, completed in 2005 after an extensive archaeological dig, is Bishops Square whose twelve storey glass slabs of corporate offices are considered comparatively bland for a design by Foster + Partners. These blocks replaced some of the former market buildings that were not listed, and now abut the listed buildings to the east (Local Character Area G). Along the north side of Brushfield Street the pretty, two-storey 1929 range of market buildings (originally used by banks and offices) were sensitively restored and extended westwards in a contemporary manner. They are considered to be assets of historical interest and included in Appendix D.

L3 This two-storey range forms a very important frontage to the street and is a critical element framing the view towards Christ Church, already identified in Local Character Area J. Any upward extension of this range, or roof-top plant, could harm this view.

L4 Between these large-scale office developments, Bishops Square itself is a major new public open space for the area, which is now benefiting from maturing trees and vegetation. The quality of paving and landscaping as well as its maintenance, is high, and the seating and tented canopy space are well

used by workers, visitors and no doubt some local residents too. The public realm has also been a location for many works of art and sculpture, often ephemeral, but two works, *Goat* and *Wooden Boat with Seven People*, now seem to be permanent features, at the south and north ends of the space. In time they may become part of the area's heritage.

L5 The most significant feature in terms of heritage, and an outcome of the extensive archaeological investigation, is the preservation in situ in the centre of Bishops Square of the walls of the charnel house or chapel crypt of St Mary Spital, publicly accessible to view down steps and through a glass lid. This is a scheduled ancient monument.

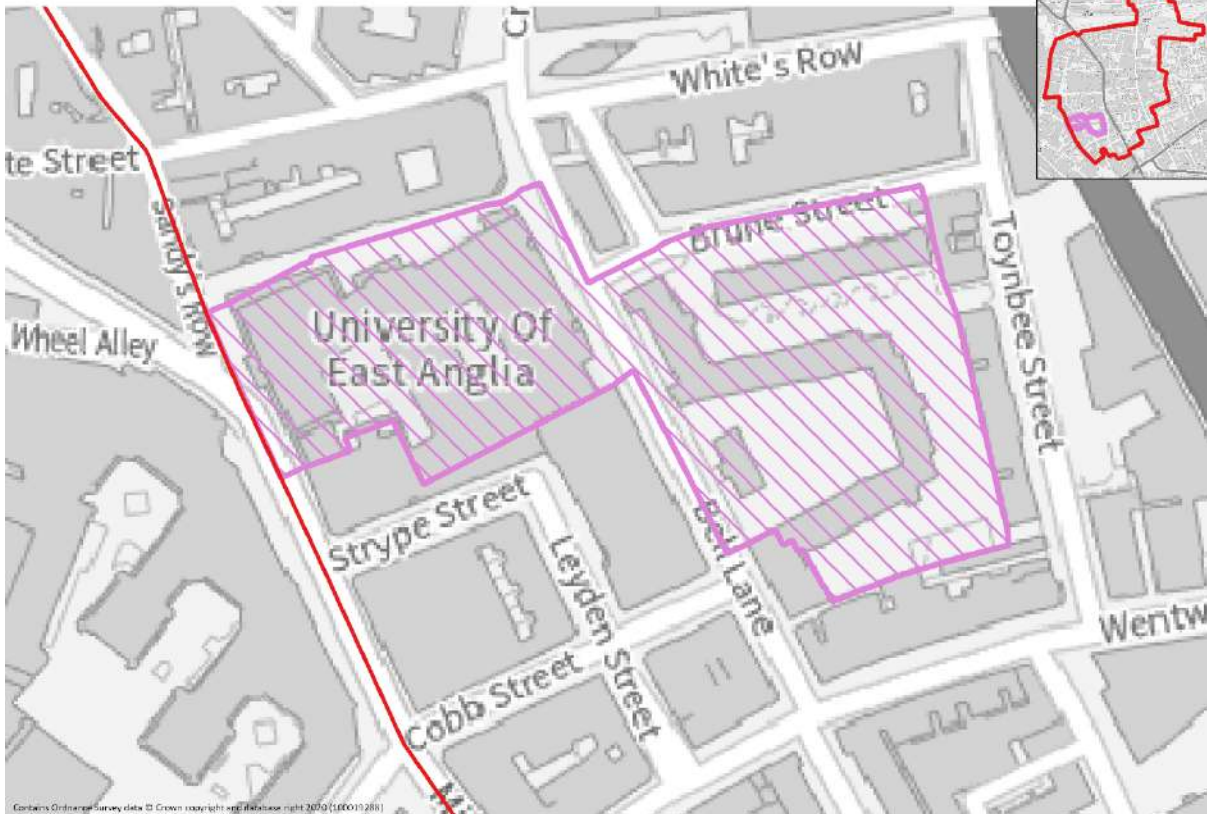
L6 The narrow alleyway of Stothard Passage is also of heritage significance, an ancient route that follows the line of 12th century monastic walls. The 17th century house at No.1, although much rebuilt, probably incorporates fragments of medieval fabric. Surprisingly it is not listed, and is included in the list of assets of historical interest in Appendix D.

L7 The pedestrian route from Bishops Square to Bishopsgate between Nos. 250 and 288 is also important as a reminder of former streets.

L8 North of Bishops Square, Lamb Street connects Spital Square with Commercial Street, partly pedestrianised, and behind the low range of food outlets on its north side lies the sequestered open space of Elder Gardens, a pleasant oasis of trees and shrubs, which connects to Folgate Street via Nantes Passage.

L9 Although the commercial development of Bishops Square and Bishopsgate is quite recent, the uncertain future demand for large office accommodation may hasten a rethink about their use. It remains to be seen how adaptable these buildings might be. Were redevelopment ever to be contemplated, then a lower scale and a wider mix of uses, including residential, would be welcome.

M - Bell Lane



M1 Lying between the Artillery Passage and Wentworth Street Conservation Areas, this area comprises two distinctive parts and groups of buildings either side of Bell Lane. To the east is the Holland Estate, built 1927 – 1936 by the London County Council, including a series of mainly four-storey brick blocks in neo-Georgian style, built in robust brick with good details which survive except for plastic replacement windows. These comprise Brune, Barnett and Carter Houses. Other parts of this LCC development lie within the Wentworth Street CA, Local Character Area K, including Bernard House, facing Toynbee Street, and the north and south sides of Wentworth Street. Together they form a strong group. Indeed, there is a strong argument for adding the blocks in Local Character Area M into the Wentworth Street Conservation Area so that the whole estate shares the same level of protection. The inter-war blocks are considered to be of local heritage merit and therefore have been added to the list of non-designated heritage assets in Appendix B.

M2 There are good views into the estate from Toynbee Street and Bell Lane, with the blocks satisfyingly arranged around generous communal space.

M3 To the west of Bell Lane is the former site of the 19th century Jewish Free School, demolished in 1939, and whose site was redeveloped in 2010 as The Nido, 100 Middlesex Street. The 112 metre tower provides student accommodation. The design of the tower and its substantial podium, by T.P. Bennett Architects, makes little concession to its context, either in terms of materials or architectural form.

M4 The tower in particular has a negative impact on the surrounding area, including views within Local Character Areas J and K.

N - Lolesworth



N1 This area has a surprisingly cohesive character. Historically the site of Rothschild Buildings, built to house the Jewish poor, and demolished in the 1970s, the area including Flower and Dean Street, Thrawl Street and Nathaniel Close, was redeveloped in 1983/4 by Sheppard, Epstein & Hunter for the Toynbee Housing Association, comprising 2/3 storey housing, densely grouped around pedestrian routes, brown brick with expansive sloping roofs, praised in *The Buildings of England*. After nearly forty years the buildings and their landscape seem to have matured well, and the area possesses a cohesive sense of community as well as architecture.

N2 The reinstated 1886 archway provides a focus onto Wentworth Street. From here there is an unusual view northwards along Flower and Dean Street towards the fine tall plane trees behind Christ Church churchyard, the round-arched windows of the rear of Fashion Street and the tops of the attics and roofs of Fournier Street. Efforts should be made to protect this view.

O - St. Jude



O1 This area borders the Wentworth Street Conservation Area, and falls into three parts each with a distinct character.

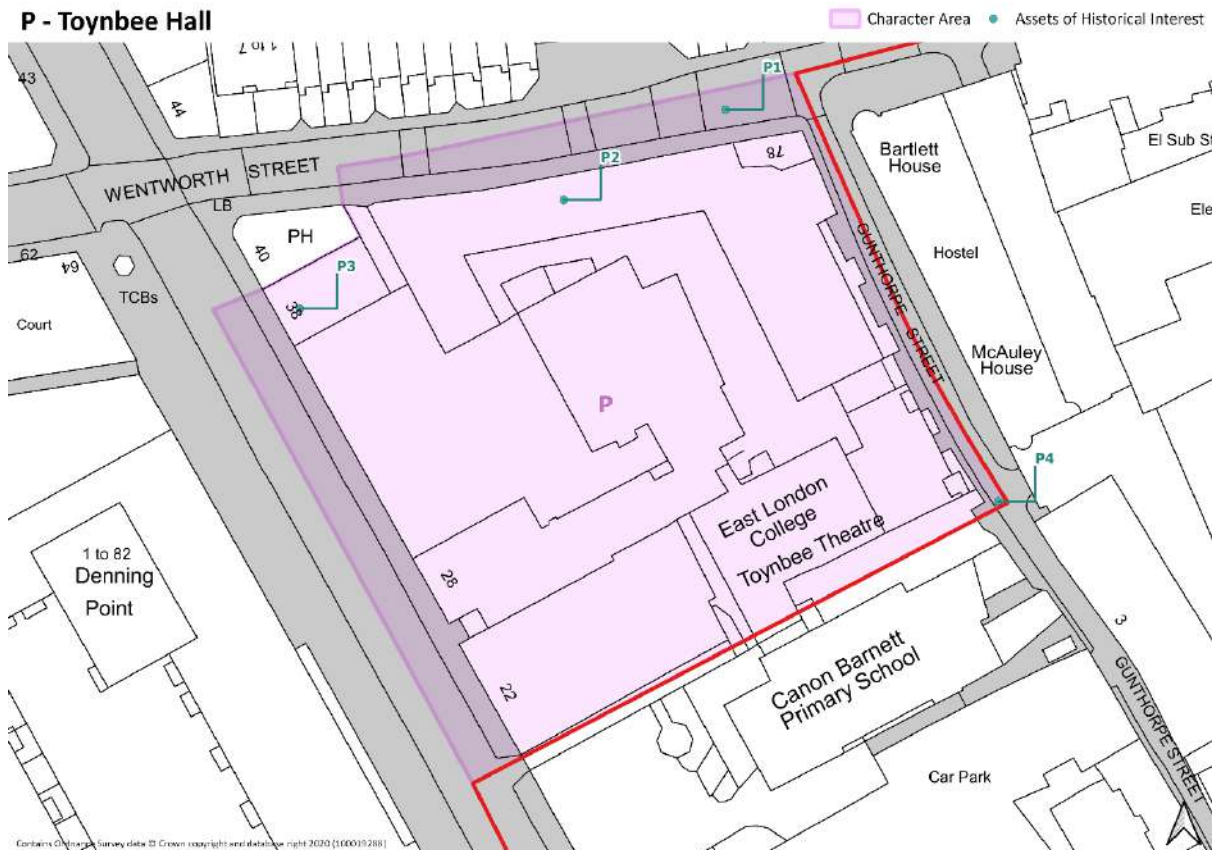
O2 West of Goulston Street, either side of New Goulston Street, is three and four storey late 20th century housing, all in brown brick with colourful window frames. Although the development does not respond precisely to historic building forms or plots, the old streets survive (including historic granite setts in New Goulston Street, partially revealed), and the scale of buildings is subservient to the warehouses and tenements of Middlesex Street, Wentworth Street and Goulston Street to the west, north and east. This sympathetic scale should be retained, were redevelopment or intensification to be contemplated.

O3 Between Old Castle Street and Goulston Street are two well-constructed interwar LCC housing blocks, Jacobson and Herbert Houses, which sit in pleasant landscaped grounds. These two blocks contribute positively to the area, and have been included on the list of assets of historical interest Appendix D. Immediately abutting the boundary with Herbert House, but just outside the area, is the remarkable façade of the 1846 former wash house.

O4 Between Old Castle Street and Commercial Street and fronting the south side of Wentworth Street the whole area has been redeveloped in the early 21st century. The four and five storey podium blocks, although set back from historic street lines on Old Castle Street and employing contemporary materials and design, do at least respect the prevailing scale of the Holland Estate and the adjacent conservation area. However the tall tower of Denning Point, as noted in Local Character Area K, has a negative impact on the Wentworth Street Conservation Area, notably the setting of the warehouses

along Commercial Street, and has an adverse impact on the setting of the listed Toynbee Hall, Local Character Area P.

O5 The new public space and pedestrian route between Old Castle Street and Commercial Street, known as Resolution Plaza, affords a good view of the recently exposed frontage of Toynbee Hall, adding to the continuum of views across the road from the pavement on the west side of Commercial Street.

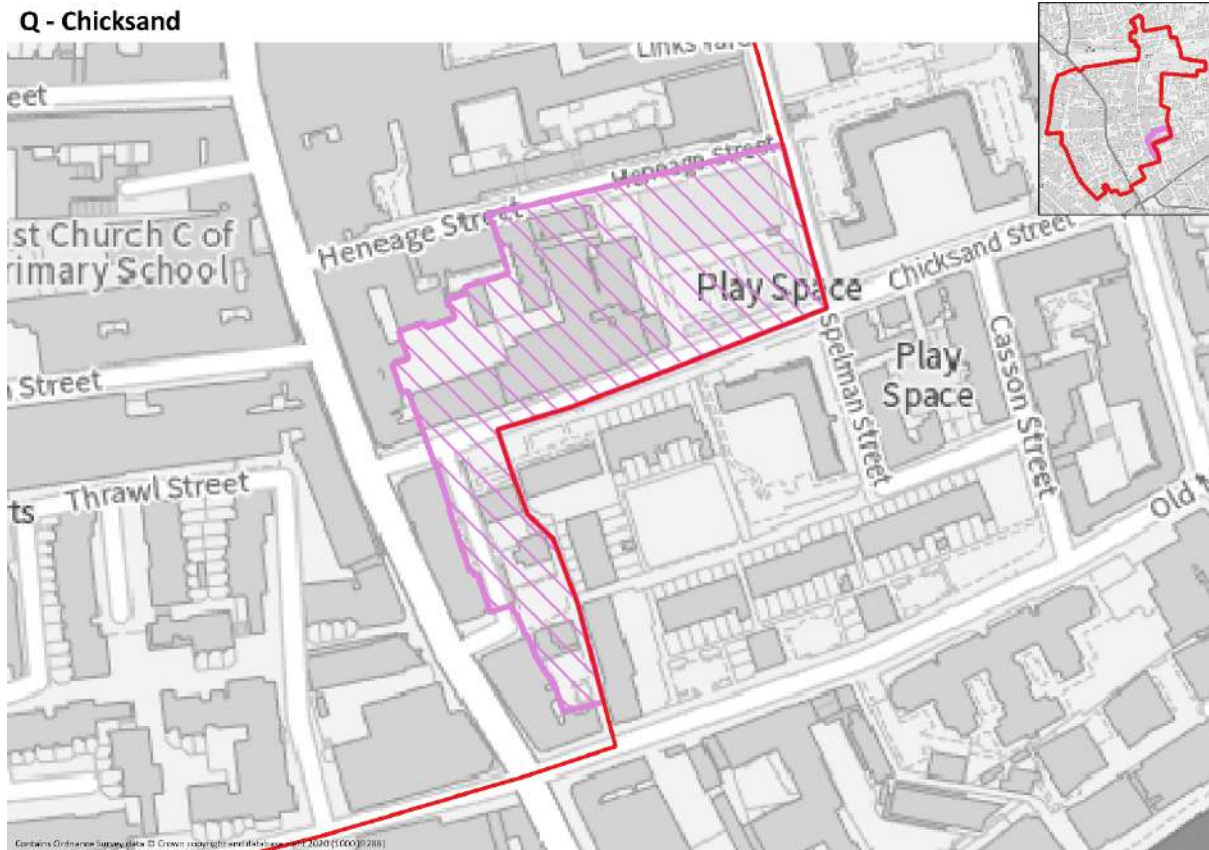


P1 Toynbee Hall and its setting have been dramatically improved in recent years. The new public gardens now provide a magnificent frontage onto Commercial Street which enables the restored Grade II listed buildings to be fully appreciated. The space is now sensitively framed by a new five-storey arcaded pale brick building to the south (next to the orange brick of the restored No.22 Commercial Street) and good quality new buildings to the north together with the existing Nos 38 and 40 Commercial Street.

P2 The south side of Wentworth Street now provides a good range of new and restored buildings. Although Toynbee Hall is listed, there are also a number of other assets of historical interest which contribute towards the character and appearance of the area. These have been included in Appendix D.

P3 Although the area is overshadowed by the tall tower of Denning Point on the west side of Commercial Street, the view of Toynbee Hall from Commercial Street looking eastwards is an important new panorama, with its 'Tudor' chimneys and roof now silhouetted against sky. Efforts should be made to protect this view, including in relation to any future development that may come forward east of Gunthorpe Street, both close by or distant.

Q - Chicksand



Q1 Lying outside but abutting the Brick Lane Conservation Area, this area comprises late C20 housing estates and a sizeable and well-used public park and playground between Heneage Street, Chicksand Street and Spelman Street, known as Chicksand Ghat.

Q2 There are no buildings of heritage interest in the area, but the granite setts in the carriageway of Heneage Street are worthy of note and are therefore included in the list of assets of historical interest, shown in Appendix D.

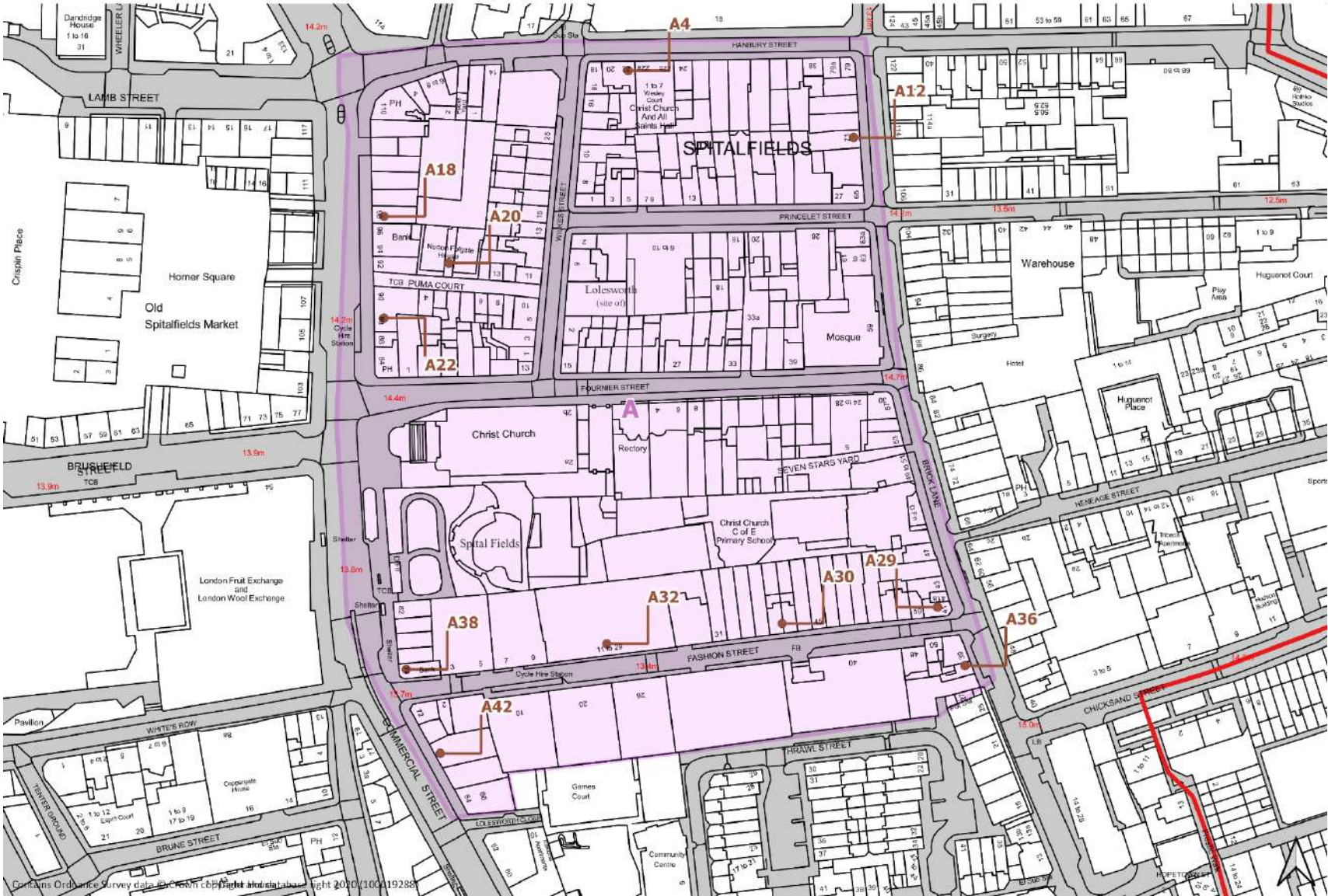
Q3 From the pavement on Spelman Street, looking across the park and multi-use games area, there is an unexpected but good view of the spire of Christ Church. Efforts should be made to his view protect this view, particularly in the consideration of future development at Bishopsgate Goodsyrd and other sites in Shoreditch.

APPENDIX B NON-DESIGNATED HERITAGE ASSETS


Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version

A - Central

Character Area ● Non-Designated Heritage Assets



Page 461

No.	Asset Name	Address	Description	Photograph
1	A12	65-79 Brick Lane	<p>65 to 79 Brick Lane (65 marks the corner house with Princelet Street) is one of the earliest (if much rebuilt and altered) and important residential groups in Spitalfields. The houses were developed in c 1705 by Joseph Truman, along with adjoining houses in Princelet Street and in Hanbury Street. Houses in Princelet Street and Hanbury Street remain more substantially intact, but widths and heights of more altered houses on Brick Lane, along with design features, arguably remain part of Truman's build.</p> <p>Number 65, brick façade rebuilt in minimal manner, in 20th century. But at first floor level, at party wall with 67, an area of 1705 brick work remains, with quoined window dressings in red brick.</p> <p>Number 67 has a facade of c 1705, flat-topped windows and string course. Possibly rebuilt in 19th century in most sympathetic manner but almost certainly original 1705 build. Façade now painted white so hard to be sure of date but a portion of window jamb at second floor level recently crumbled away to reveal early looking red bricks. This is near exposed 1705 brickwork on number 65, and the bond of this appears continuous with 67. It is far more likely than not, to judge by brick arches and other details, that this is essentially the façade and house of c 1705. Pevsner records it as an '18th century house.' Interior and rear elevations should be examined.</p>	

Number 69 was “The Laurel Tree’ public house, as proclaimed on a brick panel. Designed in pleasing permutation of Queen Anne Revival style, dated 1901 and in terracotta cartouche and entwined THB, presumably signifying public house belonged to Truman, Hanbury and Buxton brewery of Brick Lane. Pevsner suggests that ‘probably by Bruce. J. Capell for Truman’s’ (p. 418). A charming design of visual significance, with part of pub’s ornate timber oriel surviving at ground floor level.

Number 71 was re-fronted or rebuilt late 19th century in style of the 1720s houses in adjoining streets.



Number 73 was re-fronted in late 19th or early 20th century in manner of original 1705 facade. Very well done, although facing bricks perhaps a little too yellow and timber eaves cornice does not match Georgian style. It is made of moulded brick and topped with a parapet. The 1705 houses originally had timber eaves cornices and no parapets. The wide, central third floor window interesting detail, perhaps simulating original arrangement. Early houses on Hanbury Street are similar.

Number 75 was re-fronted un late 19th century in manner of 1705, but simpler than number 73, notably no string courses.



Number 77 was re-fronted in late 19th century in 1720s style, much like number 71, Number 79, on corner with Hanbury Street, late 19th century, built as a public house, was called ‘The Phoenix’. 65 - 79 Brick Lane have historic and architectural importance of the highest order.



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			As well as some of these properties having been re-fronted, behind the street frontage some of these properties have been considerably altered.	
2	A18	92-98 and 102-104 Commercial Street	<p>Modest terrace of flats over shops, including one with ground floor adapted in early 20th century to house a branch of the Midland Bank, now St. John's restaurant. Number 92, on the corner with Puma Court, was 'The Red Lion' Public House. Buildings were constructed after 1850, most presumably by c 1860. Surprisingly small and simple buildings for such a visually important site on a new thoroughfare. Reveals the difficulty the Metropolitan Board of Works must have been having letting sites along its new street.</p> <p>These properties all make a significant contribution to the townscape of this part of Spitalfields because of their front elevations (some contribute more than others, and some only at upper floors) but each has had substantial changes made to the interiors and large portions of the rear sections and roofs have been radically changed since construction.</p>	
3	A20	Norton Folgate Alms-houses, Puma Court	<p>Norton Folgate Alms-houses of 1860 by T. E. Knightly. A delightful pair of two storey ranges facing each other across a narrow court and presenting gables on their facades to Puma Court. A plaque on the wall of the alms-houses reminds us how they were put up by the Trustees of the Liberty of Norton Folgate after their original alms-houses, located in Norton Folgate, were demolished to make way for Commercial Street. These buildings are the last physical reminder of the ancient Liberty of Norton Folgate and accordingly have significant value both historically and for</p>	



Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version



			their contribution to the townscape of Spitalfields at Puma Court.	
4	A22	86-90 Commercial Street	Taller buildings, 86 denuded of classical window architraves, 88 very fine, abstracted classical with tall pilaster strips that evolve into giant arcading. Very sculptural and typical of stripped classical mid-19th century industrial architecture of Spitalfields and Shoreditch. See for example number 148, 150 Commercial Street. Most handsome and memorable group. All must date from soon after 1850.	
5	A29	41 Brick Lane	41 Brick Lane (on corner with Fashion Street), a very strong corner composition of c 1870s. Classical details, large first floor windows, probably built as a public house. Very important in the local townscape but because holds corner well, forms key part of a vista and essential part of sequence of buildings in Brick Land and Fashion Street with important group value.	

Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version

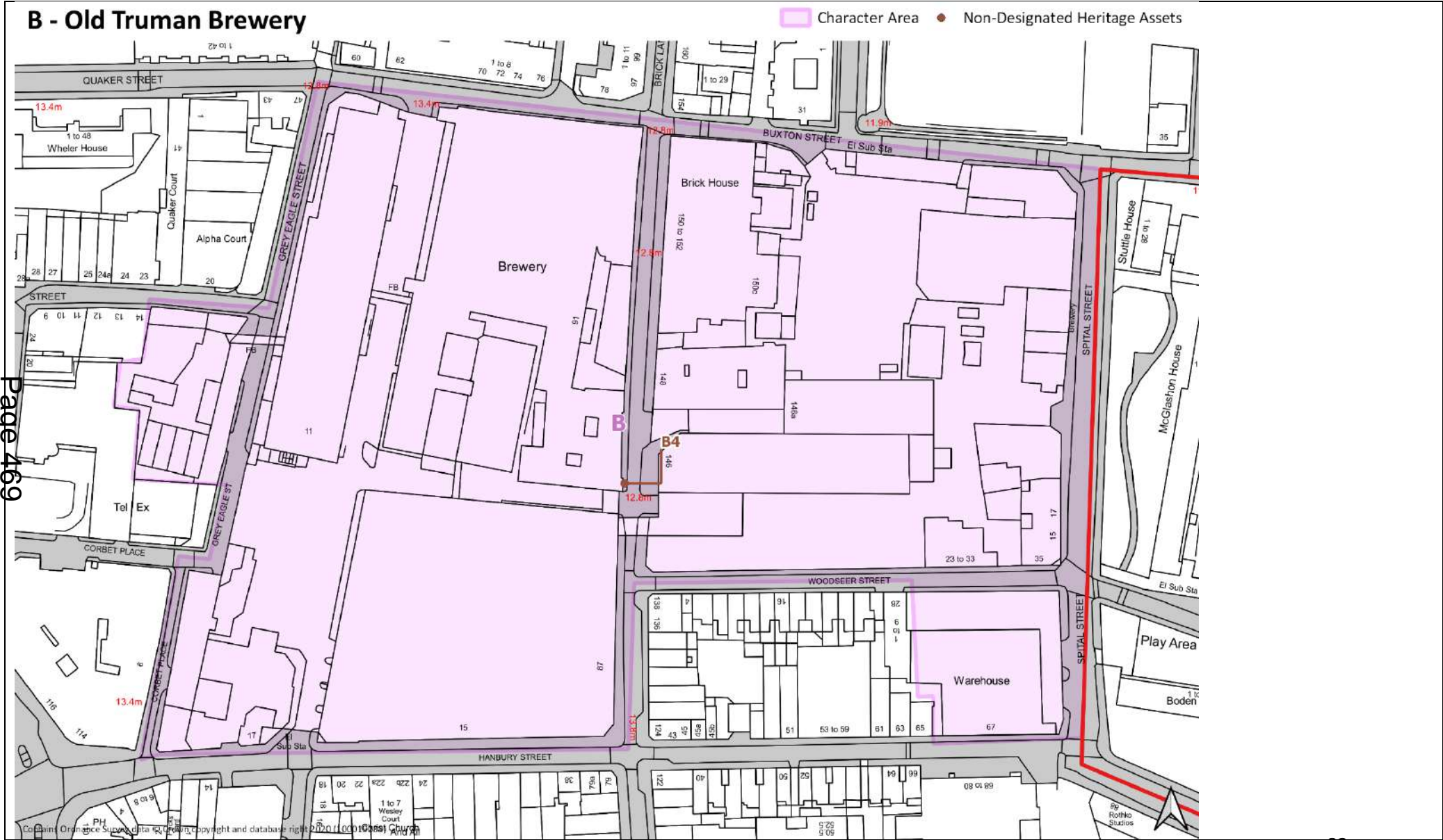
6	A30	31-59 Fashion Street	<p>A sustained terrace of apartments and shops of c 1890-1900 in simple Flemish Renaissance revival manner with third floor only single bay wide and topped by diminutive pediment to suggest terrace formed of gabled houses in 17th century Dutch/Flemish manner. Note five central houses have flat-topped gables while five on each side have pedimented tops. A nice subtle touch that gives the uniform group some visual variety in the most economic manner. The group continues for run of three buildings in Brick Lane, having skipped over a slightly earlier former pub on the corner of Brick Lane and Fashion Street. OS maps show terrace had small yards to the rear that also served buildings facing onto the church yard. Until the mid-19th century these yards were linked to form a long, narrow court. This Flemish Renaissance style was fashionable from the 1880s (see Pont Street, Chelsea) and - in much reduced form - became popular around Brick Lane (see Hanbury Street) and so something of a house-style for the area. Consequently this terrace is very important to the architectural history of Spitalfields east of Commercial Street and around Brick Lane.</p>	
7	A32	11-29 Fashion Street	<p>Built as stable yard and workshop buildings, was location of Scammell engineering works (started as wheelwrights and coach builders), where the concept of articulated lorries was invented. Building in part dates to c 1840, one corner has system of cast-iron stanchions of Doric column form and roof with timber king post trusses. The complex is of great local and national interest and historic importance.</p>	

Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version


8	A36	35-37 Brick Lane	<p>35 and 37 Brick Lane. A most interesting pair, perhaps mid to late 18th century in origin (note mansard roof and window proportions). Now with stucco fronts and mid-19th century details, including stunted tile-clad pilaster strips with bizarre wedge-shaped capitals at party walls. Most characterful and probably of early date.</p>	
9	A4	Hanbury Hall, 22a Hanbury Street	<p>Built 1719 as Huguenot church probably by Samuel Worrall. Substantial elements of original building remain, especially the east elevation facing yard of 24 (including window with timber mullions), and parts of interior, although interior much altered in recent years. However, part of dentil cornices survives. Church was originally set-back from the street within a shallow court, but in 1867 existing frontage built on north edge of court, destroying original Hanbury Street elevation and extending church to the north.</p>	

10	A38	74 Commercial Street	<p>On corner with Fashion Street. It was 'The Queen's Head' public house. More conventionally classical in the manner of 1840, but presumably late 1840s in date. Number 74 holds the corner very well - sedate and handsome, brick built but with stucco or Roman Cement for window surrounds. Details restrained and classically correct. Three storey, yellow brick with curved corner to north side of Fashion Street, name inscribed on cornice and head painted onto curved corner. Projecting bracket for sign or lantern at 1st floor. Glazed green tiles to ground floor and timber shop front. Evidently John Nash's Regent Street had been studied. If built as a public house the composition needed to be noticed, but this was achieved through style rather than through brassy vulgarity. Evidently the work of a gentleman rather than a showman.</p>	
11	A42	64-68 Commercial Street	<p>A factory and workshop block, boldly designed and eminently practical in conception - almost like a machine. The simple and functional design, with large windows, a loading bay on Commercial Street and a crane, dates from the 1850s. The only slight concession to the functionally non-essential is a rugged cornice and the odd serrations to the soffits of the window arches. But, generally, this block demonstrates most forcefully that spare and gaunt utilitarian buildings can be heroic and possesses a sublime and almost abstract beauty. Currently such architecture remains little noticed or valued in Spitalfields. Yet these buildings are of tremendous artistic and historic importance and do much to give Spitalfields its strong and distinct architectural character.</p>	

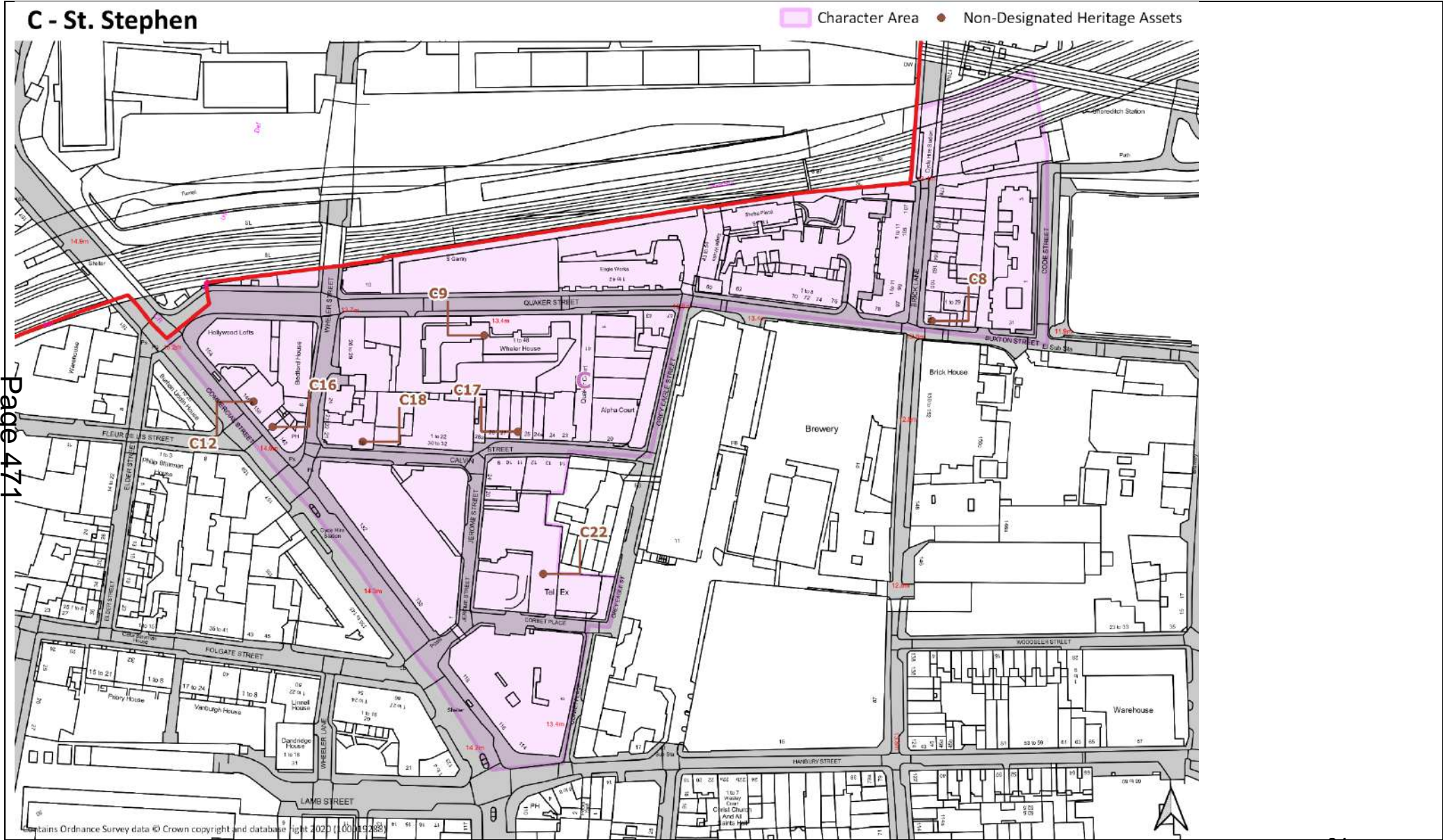
Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version





Page 469 of 697



12	B4	Brick Lane genuine cannon bollards	Pair of bollards on Brick Lane at junction with Dray Walk leading into Old Truman's brewery. The pair does not match exactly in details, but both same size and both appear to be genuine cannon, if so, it is probable they had once been mounted in warships, perhaps used during the Napoleonic Wars.	
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Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version




<p>13</p>	<p>C16</p>	<p>144-146 Commercial Street</p>	<p>144-146 broadly similar in design to the Commercial Tavern next door at 142 but slightly simpler with a few ornamental details omitted. However still a very richly decorated pair with first floor windows set within in and arcade springing from deep imposts, with keystones embellished with masks; architraves, cornices and brackets to second floor windows, and all is crowned with a bold cornice plain frieze and parapet. Ornamental decorative work is in stucco or Roman Cement, with walling of yellow brick. This is a tremendously important and visually significant group, set on a crucial curve in the alignment of Commercial Street, closing the vista to the north and offering a fine prospect to the south. These three buildings have great townscape, group - and individual - significance and form one of the best architectural set-pieces in the street.</p>		
<p>14</p>	<p>C17</p>	<p>23-28a Calvin Street</p>	<p>23-28a Calvin, a good late 19th century roughly uniform group of very good three storey workshops and shops, with loading bays. Group incorporates yard and a set-back as line of street shifts. The building is of highly significant and characterful townscape value.</p>		

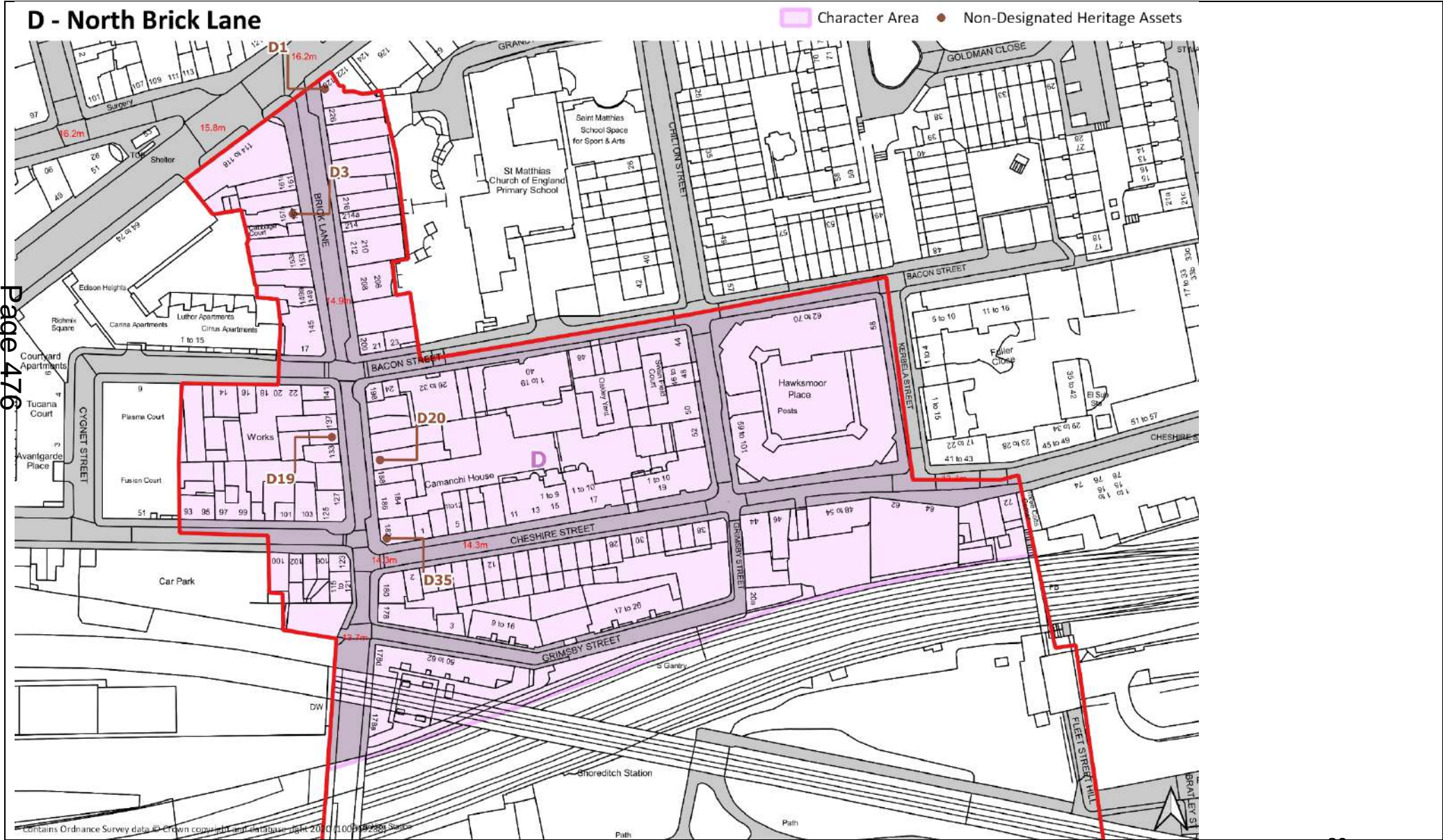
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15	C18	36 Calvin Street	<p>A late 19th century, 4 storey warehouse with central loading bay. Simple but characterful piece of industrial street architecture revealing much about character of street in the late 19th century.</p>	
16	C22	20 Jerome Street	<p>Sensational early 20th century industrial classical building, somewhat in Baroque spirit of famed electricity generating buildings for tram system. Built as telephone exchange, 1928 by the Office of Works (See The Buildings of England, London 5: East, Bridget Cherry, Charles O'Brien and Nikolaus Pevsner Yale University Press, 2005, p. 414)</p>	

Page 473

17	C8	154 Brick Lane	<p>On corner with Buxton Street, a fine former public House (The Two Brewers). A pub on the site from at least 1805, existing building c dated 1860 on panel on Buxton Street frontage, which also states 'Built S. Arno'. Ground floor late 19th century Truman tiled pub frontage. A very handsome and bold classical design with good detail to first and second floor windows. Surrounds rendered in stucco, particularly fine are wide, tripartite first floor windows, suggesting location of original dining room. This building holds a corner well and contributes significantly to the townscape of this part of Brick Lane.</p>	
	C9	Quaker Wheler, (Wheler House)	<p>On south side of Quaker Street, an inter-war five-storey, brick-built gallery access block of council flats. Some slight Art-Deco forms and detailing, particularly galleries with convex, convex quadrant curves. Block commemorates a moment in the architectural history of council housing in Spitalfields and replaced part of the network of bleak courts described in 1840s and 1880s by Engels and Charles Booth.</p>	

19	C12	148-150 Commercial Street	<p>Matching pair of commercial/industrial building with plain facades articulated by giant pilaster strips that are linked at the top to form a giant arcade. The building is now rendered and painted off-white, which gives this powerful abstract facade treatment an added sculptural quality, especially when late morning sun rakes across its frontage. The building must date from the late 1850s or early 1860s and is typical of the more characterful and visually striking industrial architecture being constructed at the time in Shoreditch (see Charlotte Road) and Spitalfields (see 88 Commercial Street). The unusual simplicity of this bold façade is most clear appreciated when seen in the context of its flamboyant neighbours of similar date. The contrast could not be more dramatic. This is a truly wonderful and very important group that encapsulates the history of the early building of Commercial Street.</p>	
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Page 476

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Page 477



20	D1	120 Bethnal Green Road	<p>East corner with Brick lane, formerly The Flower Pot public house, late C19, 4 storey, corner turret, wide 1st floor windows, paired windows above, very fine corner building, C20 shop front.</p>	
21	D19	137-141 Brick Lane	<p>A very good and characterful mixed group, mid to late 19th century date, Number 137 was built as a public house "The Dukes Motto". Three storeys with faience tile elevation to upper floors, cornice, mouldings, brackets for hanging signs. Façade looks early 20th century. 139 and 141 particularly good pair, perhaps c 1840- rendered cornice to 139, architraves and cornices to windows of 141, decorated stucco window surround and hoods, possesses a splendid radial corner where elevation turns into Bacon Street. Buildings frame an important vista south along Brick Lane.</p>	

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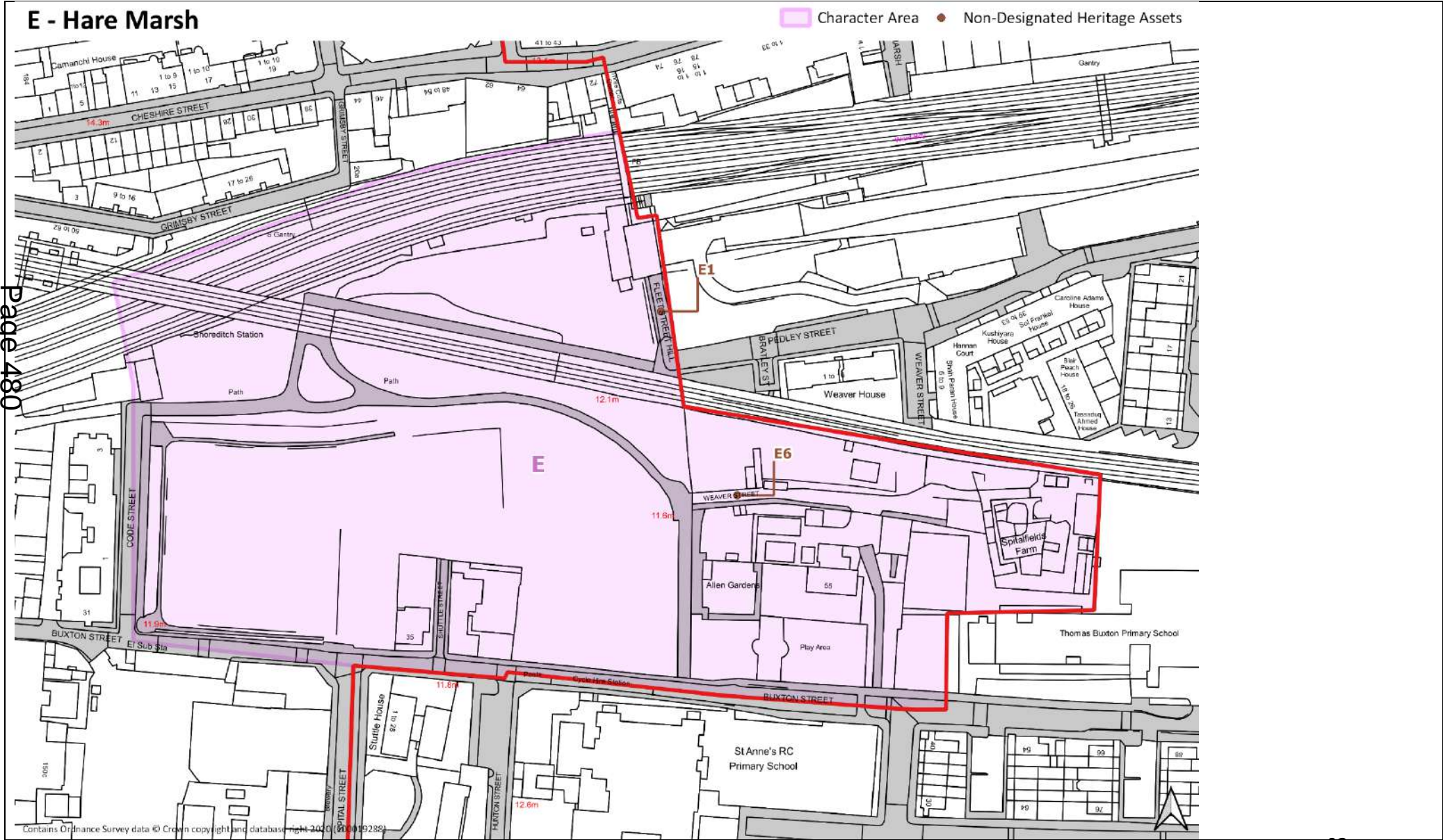
Page 22
178

					
D20	190 Brick Lane		Very important house of the 1770s. Documented and described in Peter Guillerey's book.		

Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version

23	D3	157 Brick Lane	<p>Former public house 1930s, in free Queen Anne style, symmetric with pair of flat Dutch gable, yellow brick with red brick projecting window arches, ornate rainwater hoppers, and central cartouche 'THE JOLLY BUTCHERS TRUMAN HANBURY BUXTON & CO. LTD.'</p>	
24	D35	182 Brick Lane	<p>Solid red brick classical building of c 1900 with classical details including key stones, a first floor pedimented window and crowning cornice at eaves level. Holds the corner very well, so great townscape importance. As dominant character suggests, was built as a public house - The Old Crown. (some documents state was 'The Old George.'</p>	



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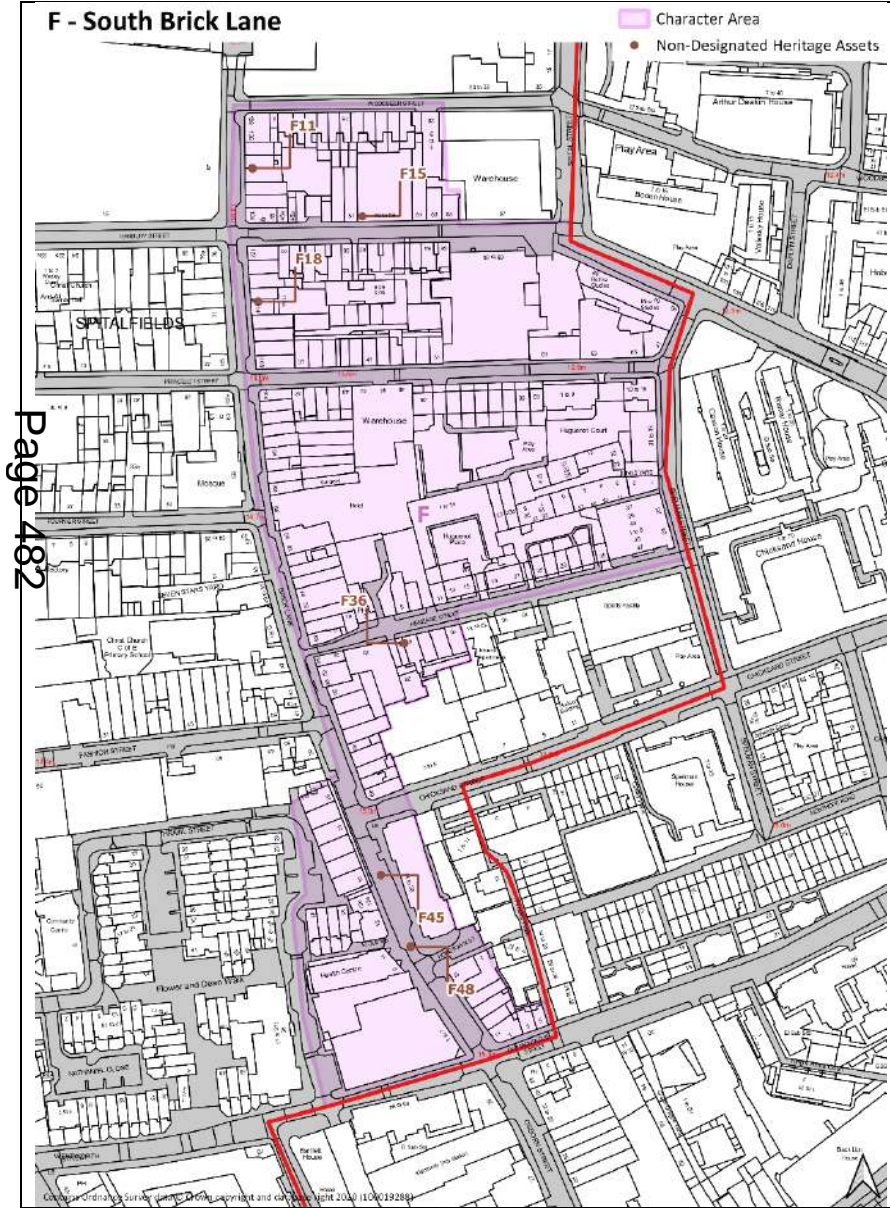


page 480



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25	E1	Fleet Street Hill arch	Arch within viaduct leads to stairs and bridge over railway lines. Famous and very piece of local townscape. In adjoin lot element from 1890s extension to Liverpool Street Station that were salvaged in the 1980s when station redeveloped.	
26	E6	Weaver Street road surface	At east end of Allen Gardens, and within Spitalfields City Farm, portions of the area's narrow cobbled streets survive, complete with granite curbs - notably at east end of Weaver Street and cobbled yard of now lost Goods Shed. (see Survey of London vol. XXVII).	






Page 482

27	F11	124-138 (even) Brick Lane	<p>Dated 1903 in cartouches on splayed corners, possibly by H.H. Collions for Jewish developers H. & I. Davis, 3 storeys red brick, steeply pitched roof and prominent dormers with varied hood treatment, flats over shops (except for Woodseer Street). Uniform terrace faced in red brick, modest Queen Anne Revival details, including profiled brick apron below second floor windows, large mullioned and pediment topped dormers that contrive to give group a gabled look in manner Flemish Renaissance Revival. Very nicely done. On corner with Hanbury Street a cartouche bearing stylised initials that appear to H F and states that 'erected' 1903. Pevsner states: 'a neat red brick terrace possibly by H. H. Collins for Jewish builder developers H & I Davis.' (p. 418). So why H.F. on cartouche and not H&ID? This is a very good group that adds greatly to the area's collection of Flemish Renaissance Revival architecture and gives distinction to this portion of Brick Lane.</p>	
28	F15	49-59 (odd) Hanbury Street	<p>1920s 4 storey, commercial workshops, large windows, timber sashes, pavement lights for basements. A very fine four storey industrial building of c 1900 of most functional design with an array of wide windows. Shops on the ground floor. Number 55 to 59 were the premises of Harry Epstein, manufacturers of high-quality furniture from the early 20th century into the 1980s. In the 1920 the company specialised in Art Deco and latterly in the reproduction of high-quality French style 18th century furniture. The building was organised as a machine to aid mass production with raw materials delivered at low level and furniture proceeding upwards to be finished in the top storey. Behind the street frontages these properties have been considerably altered in the rear parts and at roof level.</p>	

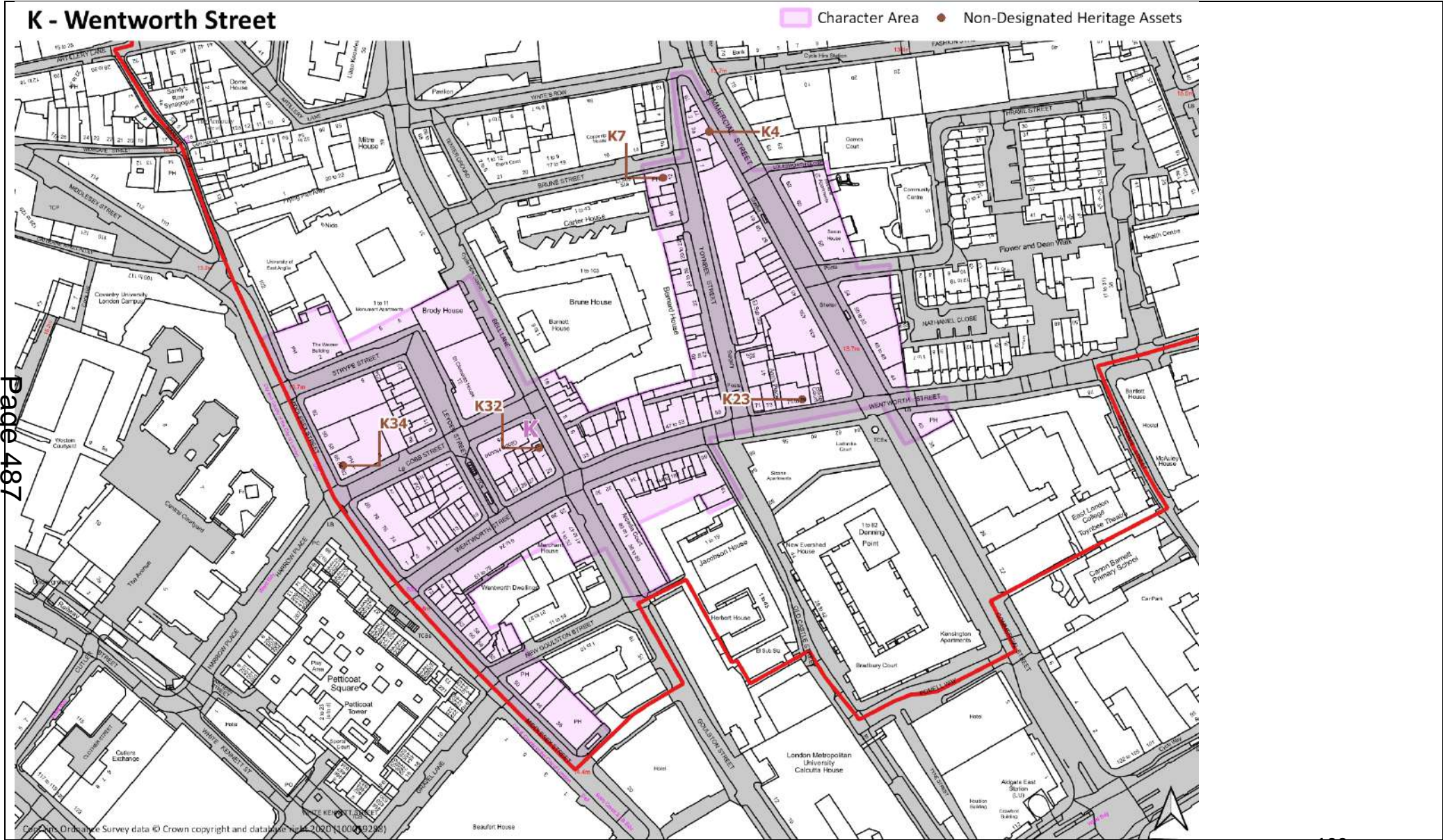
29	F18	114-122 Brick Lane	<p>A uniform group with a simple late 18th century façade. One door is dated 1797, when a famed Quaker soup kitchen was located here. Pevsner states that buildings are early 18th century in origin and some of the houses are reported to contain early joinery details.</p>	
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Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version

30	F36	2-4 Heneage Street	Mainly 3 storey, C19 houses, yellow brick with red brick arches, ground floor with rusticated render and decorative corning. No.2 formerly a synagogue called Ezrat Haim.	
31	F45	Seven Banglatown Lamp-Posts (Numbers 1-7)	These bespoke lamp-posts were put up in the late 1990s and were the result of a competition involving local schools. They are painted in the Bangladesh national colours of crimson and green and have a lamp shade in a “south Asian style” based on a waterlily, the Bangladesh state emblem.	



32	F48	Brick Lane Decorative Arch	<p>Designed by Mina Thakur, the Brick Lane Arch was erected in 1997 to mark the entrance to 'Banglatown'. The crimson and green colours come from the flag of Bangladesh. Having contributed so much to the area, the Bengali community campaigned to get the arch installed as part of celebrating Bangladeshi culture around Brick Lane</p>	
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Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version





Spitalfields Neighbourhood Plan
Submission (Regulation 16) Version


Page 488

33	K23	79 Wentworth Street	<p>Mid C19, former pub used 1859-90 as a Ragged School (Buildings of England), 3 storeys to street and 3 bays to east side elevation facing Rose Court, plus mansard, Italianate classical details to window surrounds. Late C19, possibly part of former Ragged School (see entry above), possibly also connected with 43A Commercial Street (Grade II) former Jewish School, 2 storey, yellow brick, tall multi-paned metal windows, elevations to Ann’s Place and Rose Court.</p>	
34	K32	1-7 Bell Lane	<p>C19, 2 storey range including corner to Cobb Street, ground floor shops, much altered but historic interest, probably the oldest buildings in Bell Lane, C19 cast-iron sign “COBB STREET” at 1st floor level on north elevation.</p>	

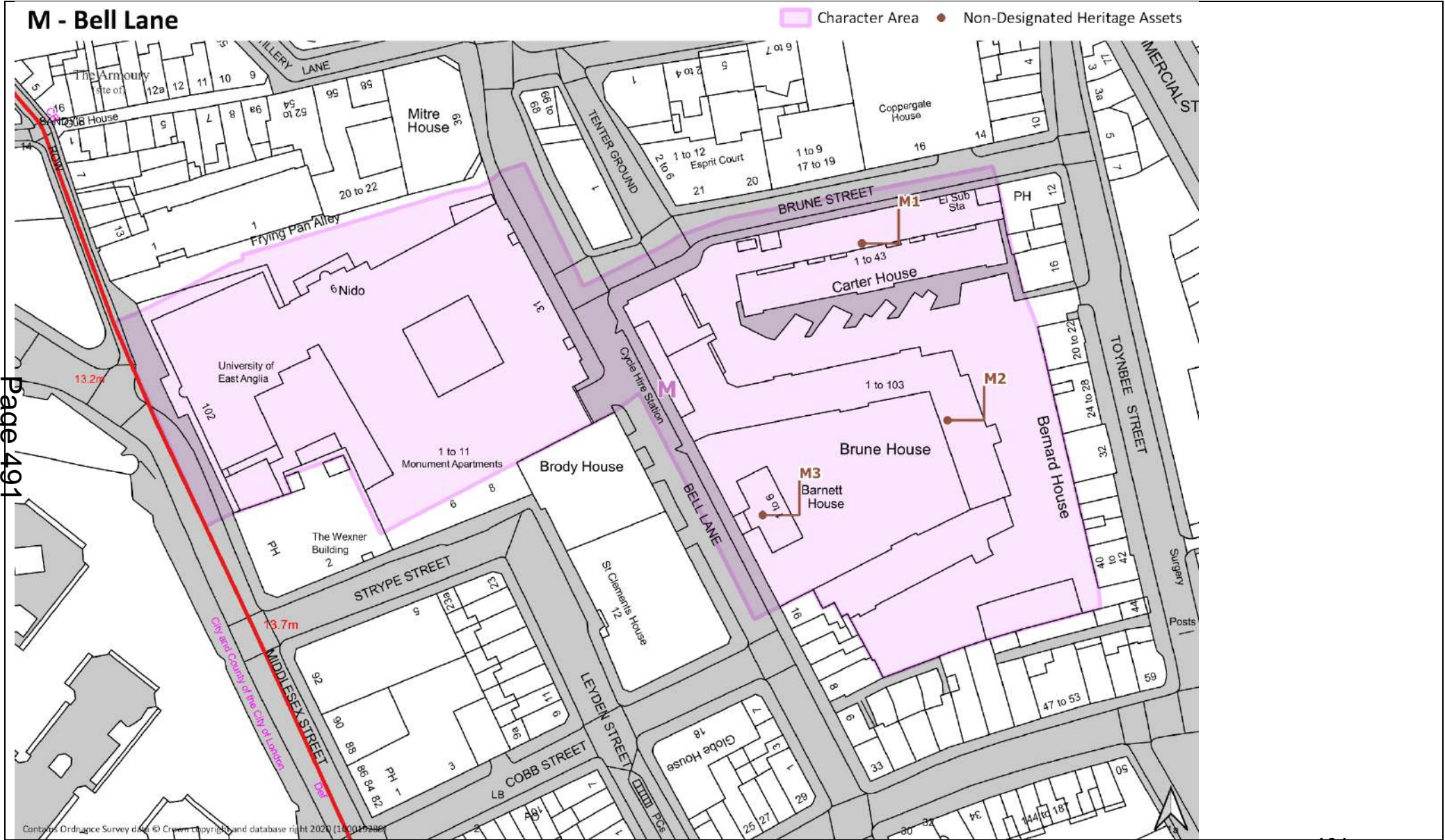
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Submission (Regulation 16) Version

35	K34	82-86 Middlesex Street	<p>Early C20, commercial, 4 storey, wide rounded gable above cornice with circular window to Middlesex Street, and asymmetric entrance door and round-headed window above, longer elevation to north side of Cobb Street with paired windows, full height loading bay and crane, yellow brick with darker brick window dressings.</p>	
6	K4	71-79 Commercial Street	<p>A characterful mixed group of shops with accommodation over. 71-75 are tall - four storeys - classical with deep eaves cornices but plain brick fronts suggesting an economical development. Number 77 only three storeys with spare Italianate detail and now with a wonderfully weathered visage. Number 79 similar scale and similar details but not identical. However probably part of the same build - note the shared rusticated pier at the party wall. Number 77 marks the corner with Toynbee Street, has a wedge-shaped plan and presents a very short bevelled, one window-wide elevation to the north. A visually striking composition and, intended or not, contrives to give the impression that this building is something of a portal to the long straight portion of Commercial Street that stretches south to Aldgate. In townscape terms this building is of vital importance. All the buildings in this group must date from the late 1840s or early</p>	



Spitalfields Neighbourhood Plan
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			<p>to mid-1850s. And note weathered advertising mural high up on party wall of 75, looking north. Should be preserved.</p> <p>Behind the street frontages much has been changed. Some of these properties have been considerably altered to the rear and roof level.</p>	
37	K7	12 Toynbee Street	<p>Public House called the Duke of Wellington at junction with Brune Street. Early C20, detached, 3 storeys including pitched roof. Semi-recessed bay at 1st floor to Toynbee Street.</p>	

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38	M1	Carter House, Brune Street	Part of Holland Estate, 1927-1935 LCC. Note “This way to shelter” painted on wall at ground floor, directing residents to communal air raid shelters during WW2.	
39	M2	Brune House, Bell Lane	Largest block on Holland Estate, 1927-1935 LCC	

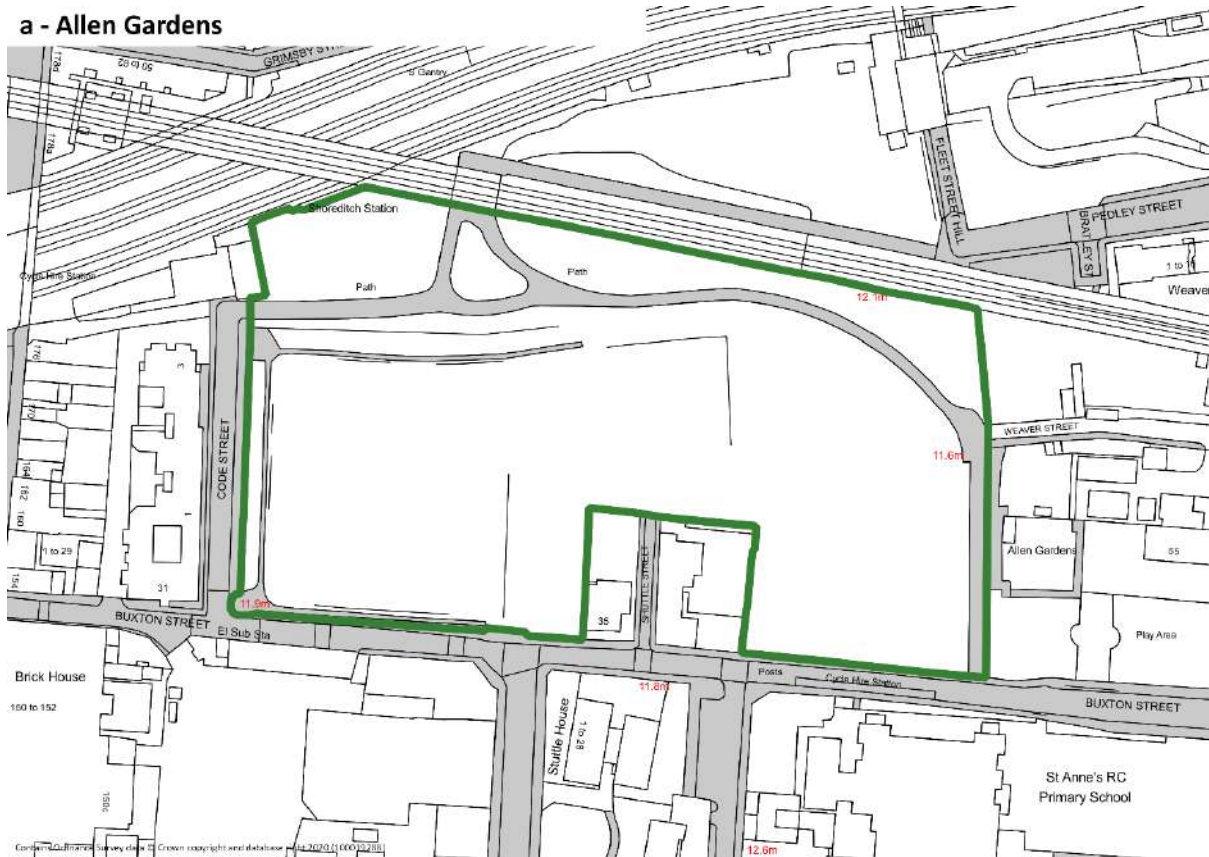
Spitalfields Neighbourhood Plan
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40	M3	Barnett House, Bell Lane	Smallest block, 3 storey, of Holland Estate 1927-1935 LCC
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APPENDIX C LOCAL GREEN SPACES

a - Allen Gardens



Allen Gardens form a substantial strip of open communal garden along Buxton Street behind Brick Lane which was laid out between 1958 and 1970.

Up until the 18th Century this park covered part of a much larger open area known as Hare Marsh. Later, in Georgian times, the land was built on and became part of a new urban development called Mile End New Town. Apart from numerous small houses, a church, a pub and two schools were also built here in the early 19th Century. The streets cleared to make way for the park were Pedley Street, Weaver Street, Shuttle Street, Eckersley Street, North Place and Fleet Street Hill.

The initial park plot was much smaller than the current park and was first laid out in 1958 on land made available when post-war temporary housing was demolished. London County Council opted to name this smaller plot in honour of William Allen; a nineteenth century philanthropist who in 1811 sponsored the opening of a non-sectarian school on the site for the poor children of the area. Allen had also been a leading member of the 'Spitalfields Soup Society' formed in 1797 in an attempt to provide relief to unemployed weavers. The park was gradually expanded during the 1960s as the derelict All Saints' Church was demolished and some remaining slums at the north end of Mile End New Town cleared. It was proposed that this additional larger area be called "Allen Fields" but this name appears not to have caught on and the whole place was soon called Allen Gardens.

Until 2006 Shoreditch Underground Station (East London Line) also operated at the north of the park, but this old station has now closed and a new Overground route has been created. The land which previously housed the East London Line track has since been backfilled and now (along the north edge

of Allen Gardens) is linked to and now considered part of Allen Gardens. At the south of the park some of the buildings of the former St. Patrick's School survived the demolition of the adjacent All Saints' Church and are now residential.

Allen Gardens is special to local people because of its value as a place for recreation and sports. Generations of local youngsters from the nearby Chicksand Estate have, since the 1960s, grown up playing football in this park with their friends. Thousands of local people remember gathering after school and on long summer days to play various sports in this vital piece of local green space. Older people have also benefited enormously through being able to use the park as a piece of local freely accessible open space to exercise and get some fresh air. This is of huge benefit to the physical health of people of all ages and all communities. Families with young children make good use of the playground equipment in the eastern end of the park which include swings, a merry-go-round and a climbing net.



Allen Gardens is special to local people because of its relative tranquillity in what is one of the most densely populated parts of the UK. Tower Hamlets has among the fastest growing populations in the UK and Spitalfields & Banglatown is noted as being a part of Tower Hamlets with an expanding population. The provision of a quiet place to escape the crowds both on our streets in busy thoroughfares like Brick Lane or Commercial Street and find somewhere quiet to contemplate, read, breathe, sunbathe and de-stress is vital to mental health and wellbeing. Most local people live in overcrowded housing without gardens. Large parts of Spitalfields are recognised in the Local Plan as suffering from an open space deficiency and it is vital that this park is not nibbled away at the edges and conserved at its largest extent to correct this shortage of open space. Many local people in the inner city spend huge amounts of time indoors and need an area where



they can enjoy sunlight. Vitamin D deficiency due to a lack of access to light is common in central London.

Allen Gardens is also valued because of its richness in wildlife. It is noted in the Local Plan as a Site of Importance for Nature Conservation and is part of the “green grid”. There are a variety of trees and bushes in the park including lime, birch, alder and elm which provide nesting and shelter for local birds. There are a group of rare elm trees in the eastern end of the park which provide a food source

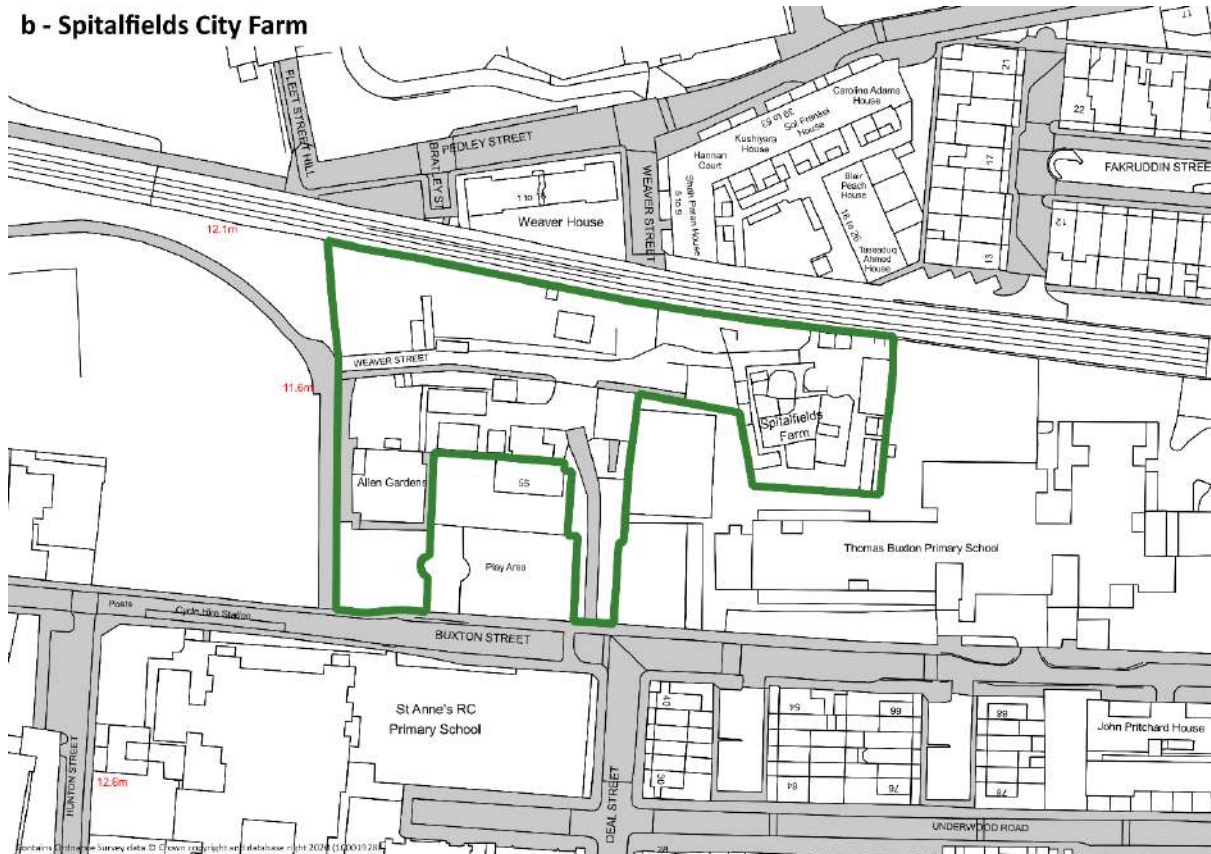
for several endangered butterflies in the larval stage such as the rare Large Tortoiseshell. Areas along the north edge of the park next to the Overground Line have been allowed to go wild and become a wildflower meadow which has provided essential habitat for insects such as various threatened species of bee and bumblebee and local populations of butterflies such as the Brimstone, Peacock, Small Tortoiseshell, Red Admiral and Orange Tip. There are also local populations of endangered herpetofauna including the



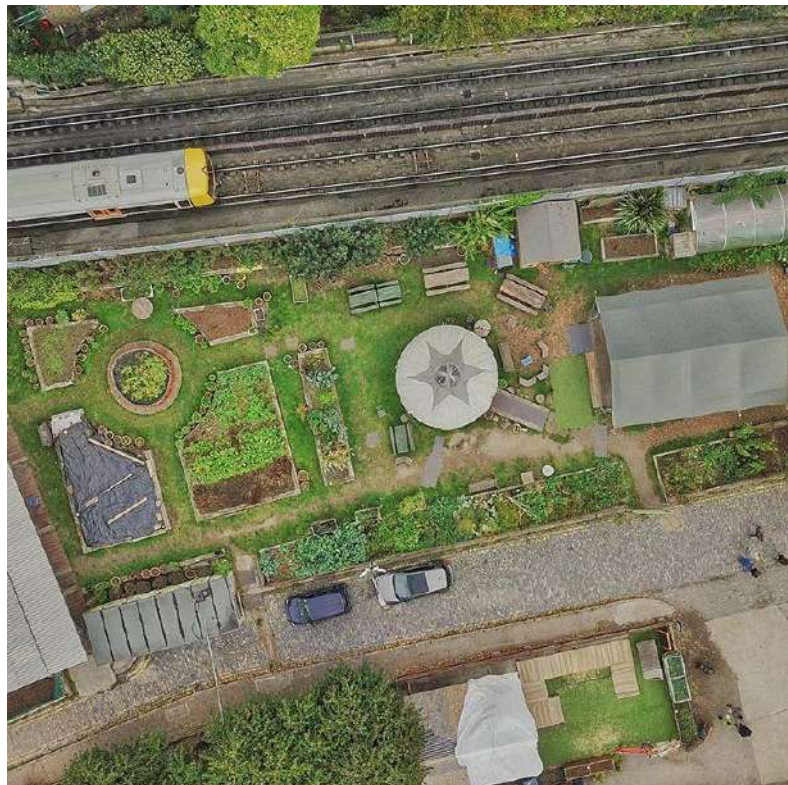
critically endangered Great Crested Newts (*Triturus Cristatus*) which is a Priority Species and has the strongest level of wildlife protection in the UK. These newts have lived in a garden of a nearby house as well as on the farm for at least the last forty years and use Allen Gardens as part of their terrestrial habitat. Protecting the full extent of Allen Gardens and making it a better place for animals and plants to live will ensure endangered and cherished local wildlife will continue to have the habitats they need to survive.

There are several projects noted in the CIL Projects list of this Neighbourhood Plan designed to intensify the green-ness of Allen Gardens and so improve it as a place for people to enjoy at their leisure and to increase its value to local biodiversity.

b - Spitalfields City Farm



Spitalfields City Farm is the nearest city farm to the square mile but is also located in one of the most deprived and densely populated wards of Tower Hamlets with one of the lowest volumes of green space per person in the country. The historically important Weaver Street, named for the weaving industry that became prevalent in this area, especially after the 19th century, runs through the farm site. Sited on a former railway goods depot, the farm was started in 1978 in response to local people's wishes to convert wasteland into allotments, having lost theirs to developers in the 1960s. The Farm gained charitable status in 1980 and has since developed into a project providing a wide range of activities and opportunities to the local community and visiting groups.



Well used, supported and enjoyed, the Farm is part of a network of city farms engaging communities and individuals of all ages, abilities and backgrounds, many of whom come from low-income households and



face social exclusion. The Farm appeals and caters to the vast demographic background of the community and offers volunteering from ages nought onwards, as well as various engagement activities for people that come through the gates. Poor physical and mental health is well documented in Tower Hamlets and the Farm aims to alleviate these issues by providing an essential green space which can reduce stress, depression and other ailments, whilst also providing fresh air and opportunities for physical activity and healthy eating. Therefore, Spitalfields City Farm remains a vibrant and colourful multi-cultural area with strong community links. Receiving over 36,000 visitors a year and spread over 1.6 acres (0.66 ha) of land owned by the London Borough of Tower Hamlets and Network Rail, the Farm keeps a selection of farm animals and has developed growing areas in every available space. In addition to vegetable growing, the Farm also maintains a series of ponds and wildlife areas that are critical to populations of biodiversity importance.



A population of crested newts has been thriving in the ponds at Spitalfields City Farm for 15 years or more, the result of an introduction to a nearby garden pond. However, as non-native Alpine Newts and European Tree Frogs, presumably from the same source, have also been seen at the farm, it was uncertain whether these were the strictly protected Great Crested Newt, or the very similar, non-native Italian Crested Newt. In April 2017, analysis of DNA samples confirmed that the newts are indeed native Great Crested Newts (*Triturus cristatus*). This amphibian is protected in the UK under the Wildlife and Countryside Act (1981), considered a priority species under the UK Post-2010 Biodiversity Framework, and is listed as a European Protected Species under Annex IV of the European Habitats Directive.

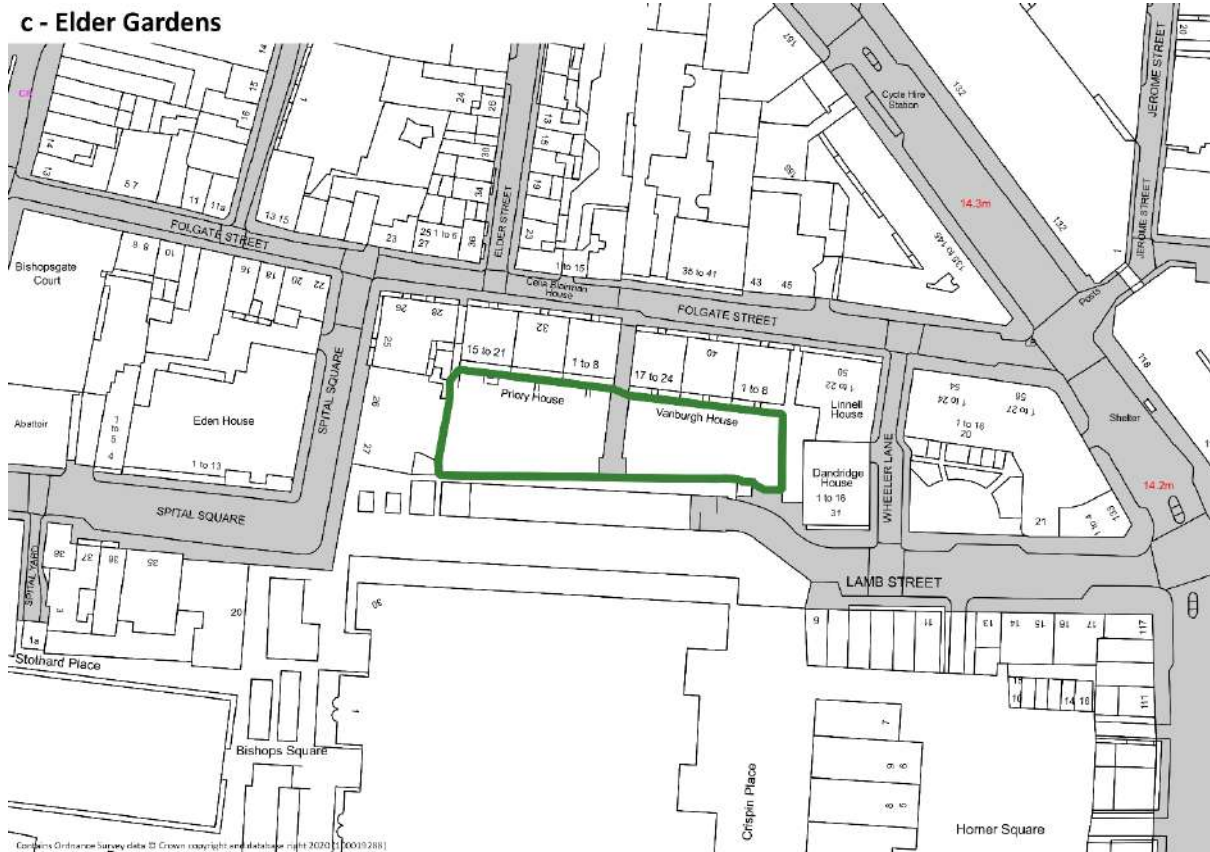
Vegetation within the wildlife pond areas include a variety of marginal and aquatic species, with small areas of open water present. The terrestrial habitat present includes vegetation managed for wildlife

including groundcover and herbaceous vegetation with shrubs and a number of trees, some of which are quite mature.

The farm's patchwork of crops, grazing paddocks, trees and hedgerows provide food, coverage and homes for a number of native birds and other important pollinator species, such as wild bees (a priority species). A growing population of house sparrows are resident to the farm. House sparrows (*Passer domesticus*) were once a common urban bird, however populations have declined drastically, with 68% declines in London since 1994.



House sparrows are currently UK BAP, London BAP, and Tower Hamlets priority species, classified in the UK as 'red' under the Birds of Conservation Concern 4: the Red List for Birds (2015).



Elder Gardens is a unique and beautifully verdant green space created as part of the development agreement for the Spitalfields Market Estate in the late 1990s. It was created primarily for the benefit of residents of the newly developed private St George Estate, comprising some 200 flats on Folgate Street, Lamb Street and Spital Square, which surround the gardens, and the benefit of the general public, particularly workers in Bishops Square office development. All enjoy it as a restful place.

All St George residents have permanent access to the gardens and the resident group is supportive of the designation. The general public also has access to the gardens during the daytime, with the gates being closed to the public from dusk until dawn. Maintenance of the gardens is handled by the current managing agents for the St George Estate, Encore Estates, who are appointed by the St George Residents Association. Costs of landscaping, planting, maintenance



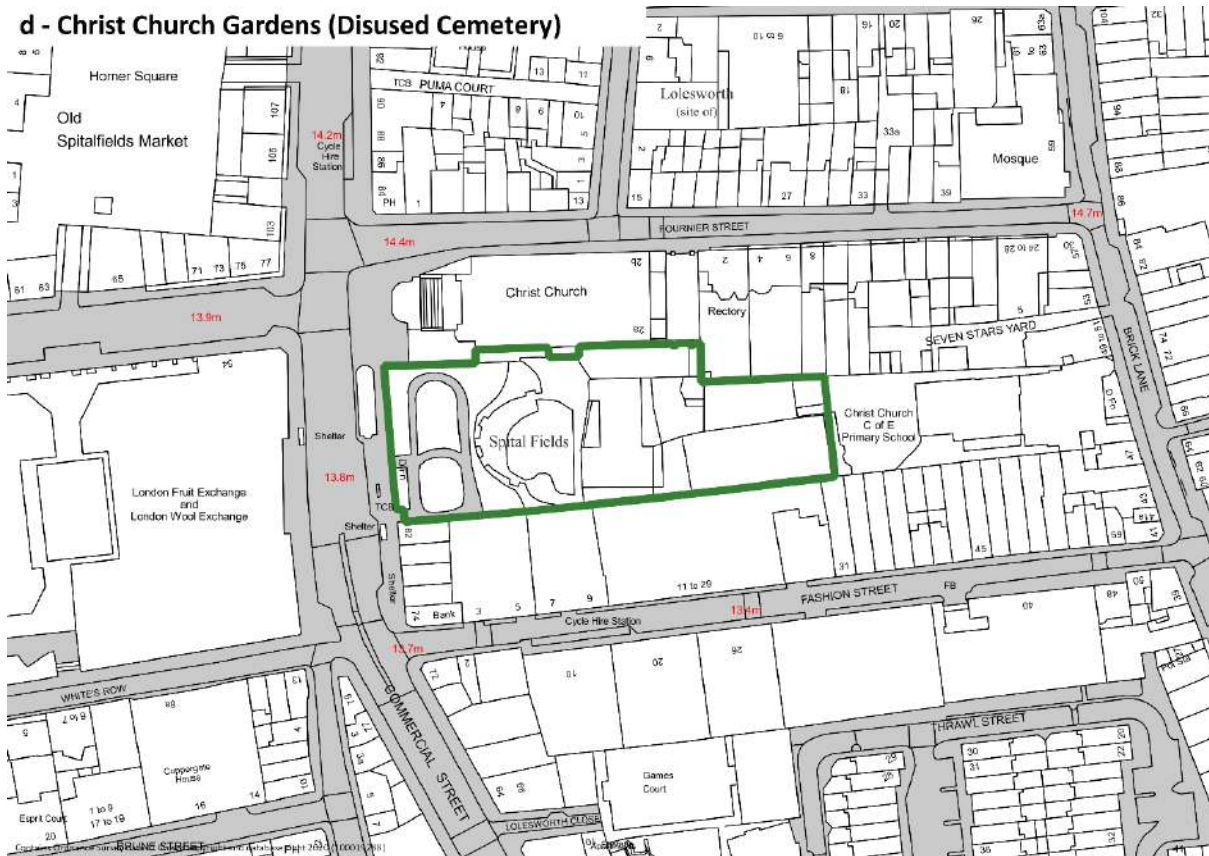
and cleaning are paid for from service charges plus an annual contribution from the owners of the Spitalfields Estate, Bishops Square SARL.

Elder Gardens provides a uniquely quiet haven from the inner city. It is admired for its tranquillity in a natural setting and is much appreciated by the Spitalfields resident community in the western part of the neighbourhood because there are so few other useable green spaces and so few residents have gardens themselves. Local office workers also appreciate the gardens as a quiet place to have a break.

There are five access points, a stone pathway through the middle between Folgate Street and Lamb Street that divides the gardens into two, bench seating. To maintain the tranquillity of this spot there is a ban on ball games, dogs and radios. There is a paved walkway around the perimeter, which makes it conducive to leisurely strolls for all ages. In contrast with other local open spaces, Elder Gardens is beautifully maintained, landscaped and planted with a wide range of trees, shrubs and flowers.

Whilst 10 Bishops Square has a substantial landscaped green roof covering the whole of its site, it is regrettably not open to the public, making Elder Gardens even more invaluable. Elder Gardens is unique to Spitalfields because it epitomises the confluence of residents, workers and the public alike, providing a green haven amongst the burgeoning City high rises.

d - Christ Church Gardens (Disused Cemetery)



Christ Church Gardens (0.38 hectares) forms the western area of Spitalfields Churchyard and has great historic significance. The Churchyard forms the curtilage, the setting of, and is integral to Grade 1 listed Christ Church Spitalfields. The Churchyard, a consecrated disused burial ground, stretches from Commercial Street to Brick Lane. It contains about 67,000 burials and rare 18C burial vaults. The Church and Churchyard, together a National Heritage Asset, is often regarded as Hawksmoor's finest work. The western area of the Churchyard, 0.38 hectares, is protected by a Trust for Public Open Space, first established by the Church of England in 1859. The garden includes the Grade II listed Nash Monument (the Portland stone obelisk topped with a flaming gadrooned urn, standing within its own railings).

The site of the new Church and Churchyard was acquired by the Commissioners of New Churches on 6 November 1711. The Church and Churchyard were consecrated on 5 July 1729.

The entire Churchyard, from Commercial Street to Brick Lane, was closed to burials in 1859. It remains a consecrated disused burial ground, containing about 67,000 burials. The Church court specified that the Churchyard must be used as *"a lawn or Ornamental Ground and as an open space in the midst of a crowded and dense population with a view to the health of the said population"*.

The Brick Lane school was built in 1873, on arches so as not to disturb the many graves that remain beneath. The eastern end of the churchyard, about 30% of the entire area, was designated for school use.

The western end of the churchyard, 0.38 hectares, about 70% of the entire burial ground, is still known as Christ Church Gardens. On 20 October 1891 the Metropolitan Public Gardens Association established an agreement *“for the laying out and maintenance of the churchyard as a public garden for all the purposes of the Open Spaces Acts 1877-1890”*.

On 5 June 1949 an agreement between the Rector and the Local Authority transferred control and management of Christ Church Gardens to the Local Authority *“for the purpose of administering the same in trust to allow the enjoyment thereof by the public as an open space”* within the meaning of the Open Spaces Act 1906.

By 1957 Christ Church was derelict, considered unsafe and closed. The Church was threatened with demolition. In 1969 Christ Church Gardens was licensed by the Local Authority to Trustees of an adventure playground, a public facility, later a youth centre. In 1987, a multi-use games area was laid out by consent of the Local Authority at the eastern-most part of Christ Church Gardens, for use by the adventure playground and the school. The Trust for Public Open Space, protecting the entire 0.38 hectares of Christ Church Gardens, subsisted throughout and survived these arrangements.



The Friends Trust had been formed in 1976, establishing a programme of restoration for Church and Churchyard, formalized in the Restoration Masterplan agreed with the Church. £15 million, much of this public money, was raised by the Friends Trust which restored the Church building, its 1735 organ, and key elements of the Churchyard, the setting integral to this National Heritage Asset.

By 2007 Christ Church Gardens had become run down, the youth facilities barely used. The site was publicly accessible until 2011 when all but the western 971 square metres, 25% of the Public Open Space Trust area, was shut.

In 2014, the Rector and Tower Hamlets entered into a further Management Agreement on substantially the same terms as in 1949, affirming Christ Church Gardens (0.38 hectares) as Public Open Space protected by the Open Spaces Act 1906.

In January 2019 the ecclesiastical appeal court published a demolition Order for the illegal building thus making way for restoration of the Public Open Space.

The gardens also contain a listed war memorial to the dead of the First World War.

Christ Church Gardens are also significant for their beauty. The adjacent Church was designed to be seen in the round, with the western and southernmost aspects incorporating the historic Churchyard regarded as most important. It was also Hawksmoor's intention that the east and south sides could be seen together from the Churchyard. Hawksmoor's genius was to imbue this monumental structure with extraordinary energy and dynamism. He had an innate sculptural feel for form and mass, and for the capacity of stone to carry meaning and metaphor.



Christ Church Gardens is significant for its recreational value and tranquility. The gardens are vital to the health and wellbeing of local people as a tranquil, open green space. Living in the most densely populated inner city area, many residents do not have their own private gardens and so depend on Christ Church Gardens as a breathing space for relaxation and recreation. Local office workers and visitors also benefit from access to the gardens to wind down during the day.



People enjoy the trees for their shade and the grass for sitting and enjoying the sunlight. A border of shrubs and herbaceous plants forms a natural screen from the road, making Christ Church Gardens a welcome oasis of calm away from the hustle and bustle of Commercial Street. Studies have proven how vital green spaces are for the reduction of stress that can otherwise lead to serious health complications. Access to nature has been shown to reduce blood pressure, pulse rate and the levels of the stress hormone cortisol in the body.

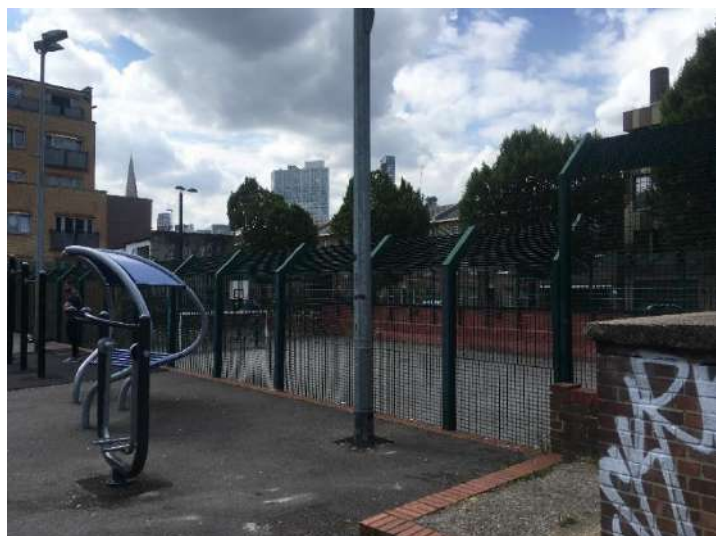
Christ Church Gardens is also important to the local population for environmental reasons. Its mature London plane trees are important in helping to reduce levels of air pollution from Commercial Street and generally. As a rare unpaved green space, Christ Church Gardens helps mitigate the urban heat island effect. The urban heat island is a phenomenon where built up areas can be considerably warmer than their rural counterparts (up to 10C higher in London), aggravating the effects of summer heat waves and increasing the local mortality rate. The open ground is also important for sustainable drainage of rainwater, whereby precipitation can be absorbed into the ground, as opposed to flowing into drains and overwhelming the system, contributing to increased flooding.

e - Chicksand Street Ghat



The Chicksand Ghat is a much-loved open space used by the community around Brick Lane and surrounding streets. The word ‘ghat’ means ‘bank’ or ‘garden’ in Bengali. The Ghat has been an iconic place ever since the migration of Bangladeshis to this area. It used to be a neglected area with an asphalt football pitch and not much else. It was well known for antisocial behaviour. It is believed the open space has existed since the 1940s.

This space is important for the local community as it is a part of its history. Anyone who has grown up around Brick Lane will know about it and will have “hung out” there as teenagers; whether to meet and socialise with friends or to play football. This space has always been associated with young people and sports. It has and continues to be used by local youth provisions for interclub games.



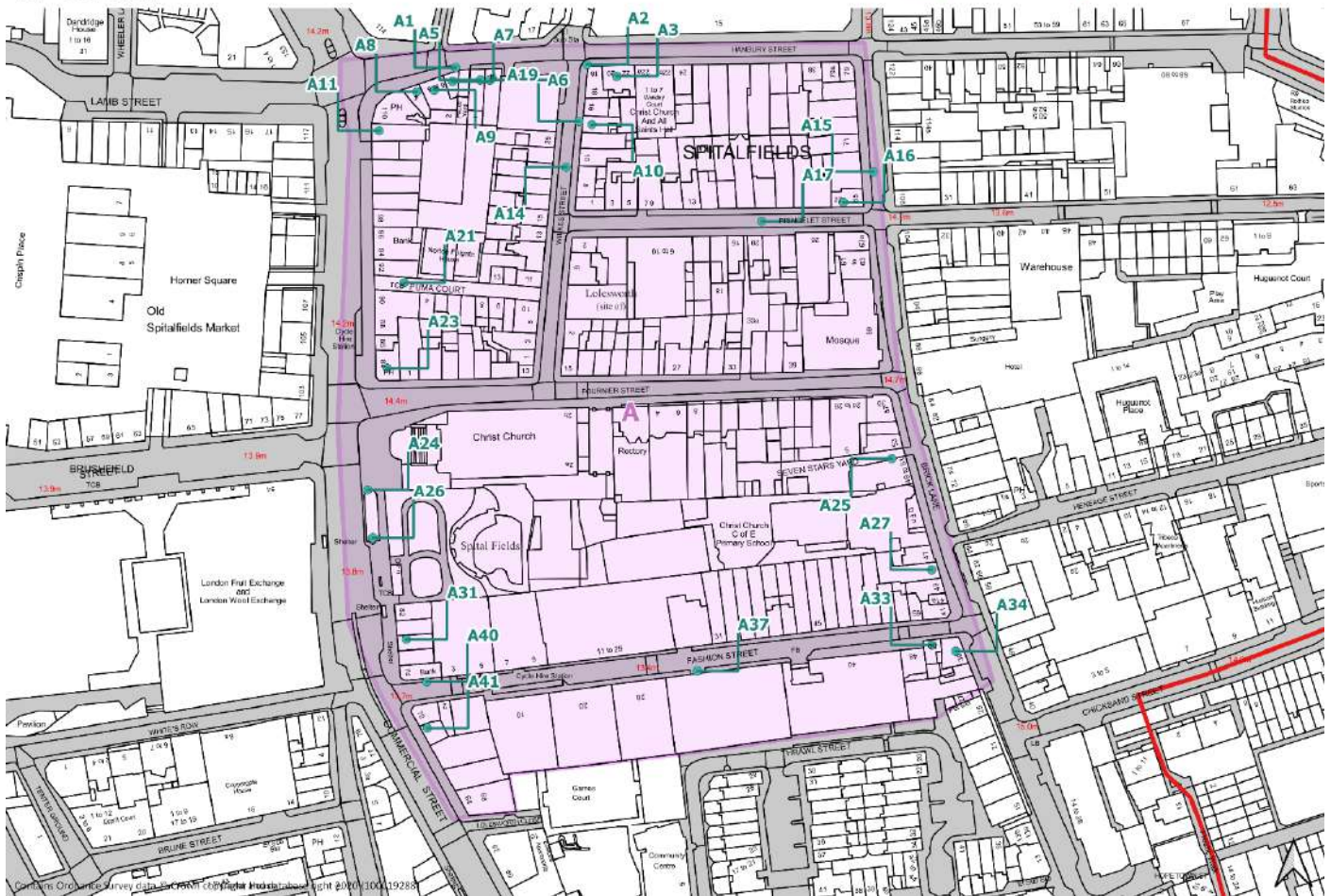
Since its redevelopment, it has attracted the wider community; from families with small children to youth to the elderly. The youth now have a hangout shelter and of course the much-loved football pitch which has been refurbished as a Multi-Use Games Area (MUGA). As such, the multi-use of this area forms a natural deterrent to inappropriate behaviours making the area a safer place for all to live and play. The elderly now feel that they can use this space and use it to take their regular exercise. The park is surrounded by tower blocks with no gardens and therefore has become a welcoming oasis where all residents can enjoy the fresh air and play which supports aspects of health and wellbeing. It also encourages community cohesion; bringing different residents together in a neutral space to get to know each other, socialise and create support networks.



APPENDIX D ASSETS OF HISTORICAL INTEREST

A - Central

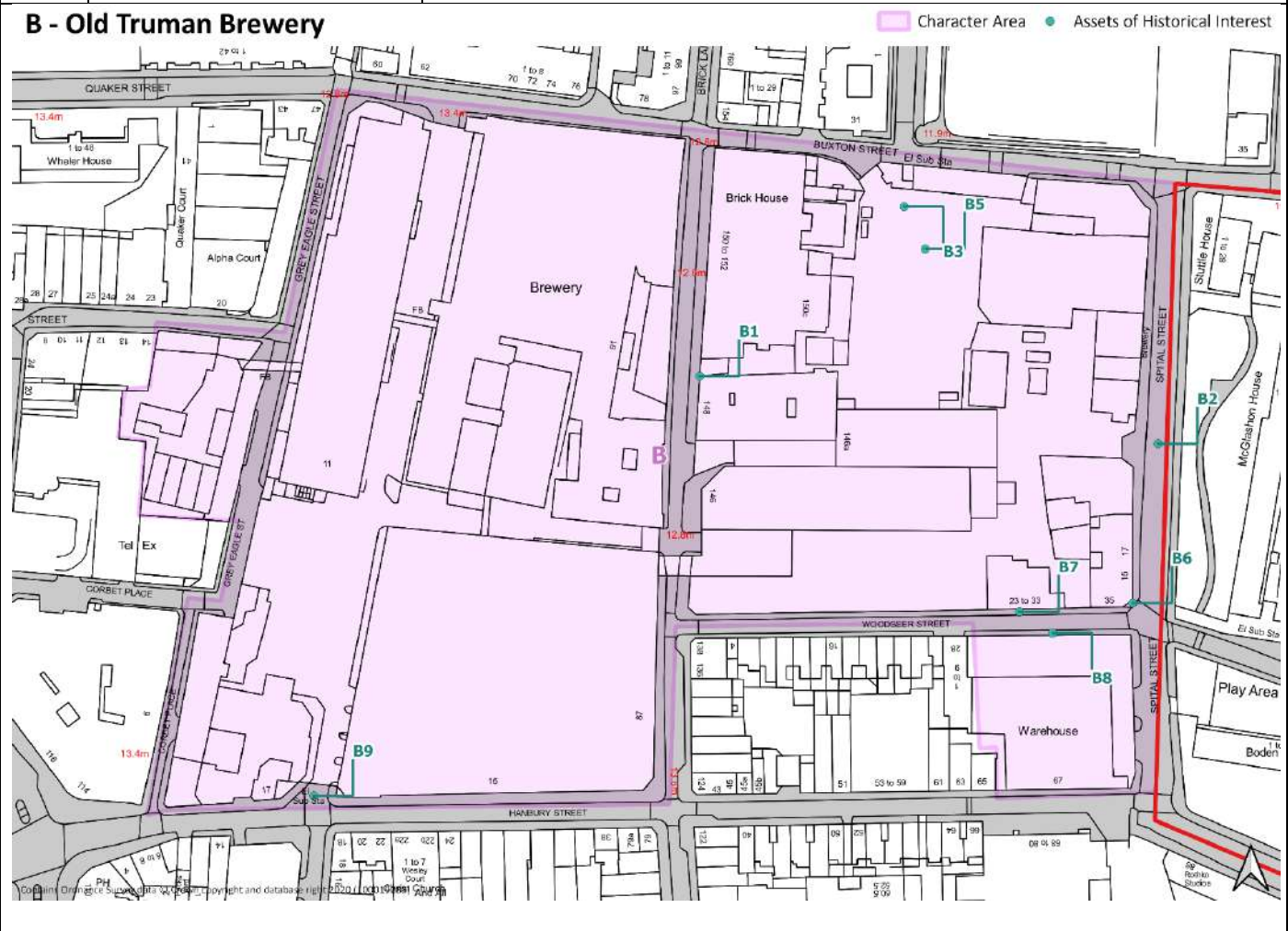
Character Area ● Assets of Historical Interest



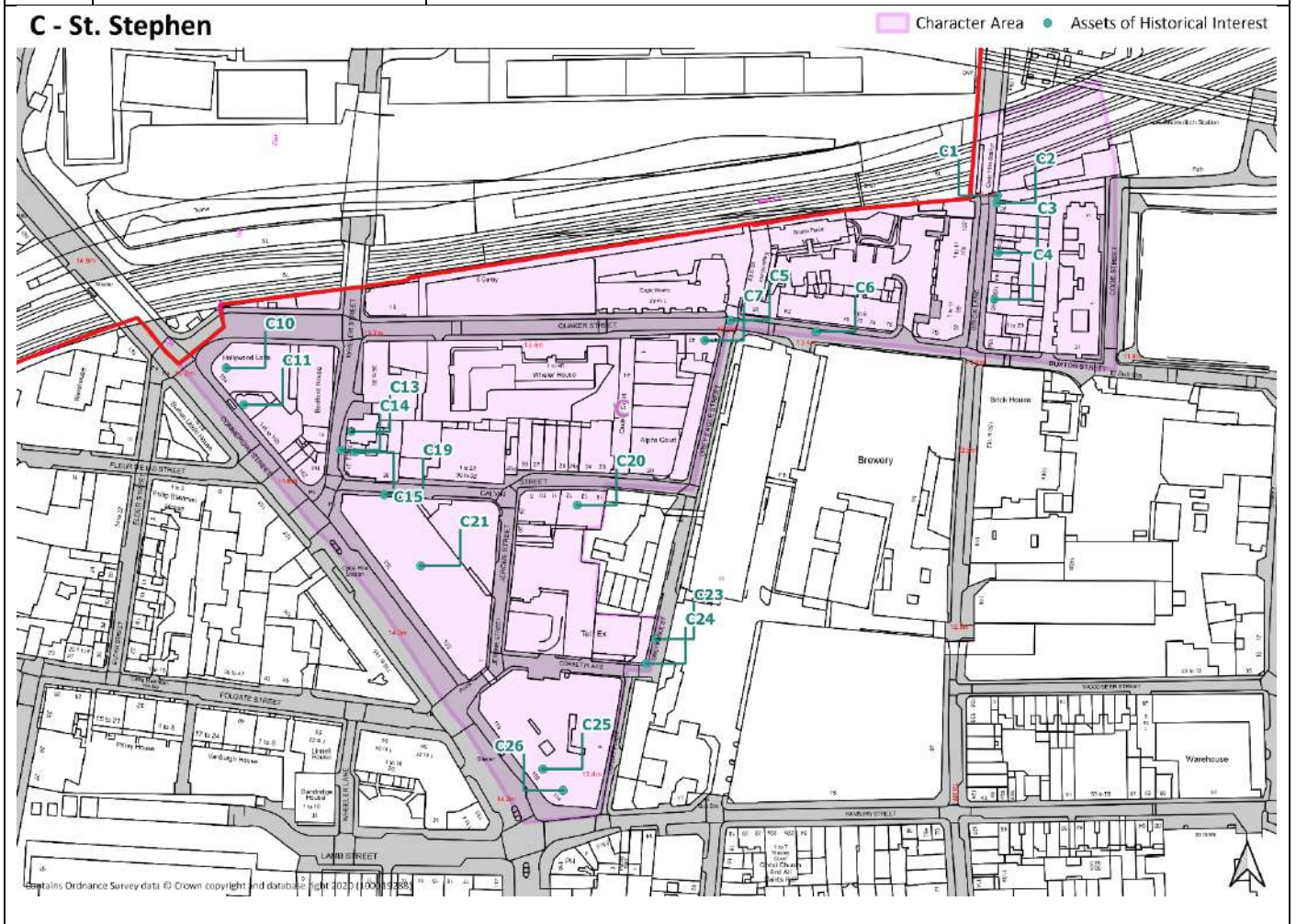
Map Ref.	Address	Description
A1	Hanbury Street - bollard	A bollard of 1819, inscribed with date an 'Christ Church Middx' and a chamfered obelisk bollard of mid to late 19th century date inscribed BW WD. Identical to bollard in Crispin Street
A2	Hanbury Street - bollards	At junction of Hanbury Street and Wilkes Street, a pair of cast-iron cannon type bollards, with lettering 'Christ Church Middx 1819'.
A3	20 Hanbury Street ("Keep Zero Gallery")	20-22 Hanbury Street is a pair of c 1880, brick built, four storeys high and each two windows wide. They make a handsome block and share a central pediment-topped door. Within the pediment is an escutcheon bearing the initials EL. Not the estate so presumably the initials of the builder or the first occupant, suggesting block was built for commercial use. The building replaces houses of 1723/4.
A5	12 Hanbury Street ("Rosa's")	An early to mid 19th century group of houses and shops that make a vital contribution to sustaining established character at the junction with Commercial Street. Adjoining is the Golden Heart public house, now listed grade II. Best in the group is number 12, with first floor windows set in relieving arches in style of c 1820, but house could be more than a decade later.

Map Ref.	Address	Description
A6	14 Hanbury Street ("Sparks")	14 is part of a an early to mid 19th century group of houses and shops that make a vital contribution to sustaining established character at the junction with Commercial Street. Adjoining is the Golden Heart public house, now listed grade II.
A7	10 Hanbury Street ("Japanika")	Incorporated in number 10 arch to Peck's Yard. Peck was a major local businessman in the early 18th century and a dyer so part of the silk industry. His monument is in Christ Church and a number of his vats survive in situ near the yard. it is part of a group of early to mid 19th century group of houses and shops that make a vital contribution to sustaining established character at the junction with Commercial Street.
A8	4 Hanbury Street	Number 4 is part of an early to mid 19th century group of houses and shops that make a vital contribution to sustaining established character at the junction with Commercial Street. Adjoining is the Golden Heart public house, now listed grade II. Best in the group is number 12, with first floor windows set in relieving arches in style of c 1820, but house could be more than a decade later.
A9	6-8 Hanbury Street ("Poppies Fish & Chips")	6-8 is part of an early to mid 19th century group of houses and shops that make a vital contribution to sustaining established character at the junction with Commercial Street. Adjoining is the Golden Heart public house, now listed grade II.
A10	14 Wilkes Street	14 Wilkes St. This house was built in 1721/2 and its front rebuilt in the late 19 th century in a manner that, in general, echoes the original design. Substantial remains of early interior. I assumed was grade II listed. It should be.
A11	108 Commercial Street - note historic signage "Wakefield of Spitalfields"	Simple shop with flat over, c 1850
A14	Wilkes Street hidden road surface	Section of cobbles exposed beneath tarmac.
A15	Brick Lane - 1818 bollard	Bollard, corner of Brick Lane with Princelet Street (on east side of Lane). Inscribed Christ Church Middx, 1818. This is only surviving bollard to have this date not 1819.
A16	27-29 Princelet Street	Late 19c tenements, 3 and 4 storey, yellow brick with red brick dressings. Shadow of painted advertisement on Princelet Street elevation . Good brick built block with delicate brick details, including dentil string course c 1880. A strong composition.
A17	Princelet Street hidden road surface	Section of cobbles exposed beneath tarmac.
A19	Wilkes Street - bollard	In Wilkes Street a bollard of similar design, but without lettering.
A21	Puma Court, flagstones	The court has very good York Stone paving. All in all the court is a most characterful and precious enclave.
A23	84 Commercial Street	The Ten Bells Public House. The building dates from c 1755 (see rear elevation, hopper head and interior details in upper level, but refronted c 1850 - 60, with pub frontage and ground floor interior of c 1890, with good tile-work, by Wm. B. Simpson & Sons. A very powerful and poetic piece that, in its way, holds its own against Christ Church opposite. No mean achievement.

Map Ref.	Address	Description
A24	Fournier Street - bollard	MBS (Metropolitan Borough of Stepney) stanchion bollard.
A25	49 Brick Lane, formerly "The Seven Stars" P.H.	49 Brick Lane, built 1937 as a public house, the Seven Stars, designed by William Stewart. Closed in 2002. Large rear extension and yard. A striking design, original ground floor pub frontage, brick first floor and stucco second floor. Vernacular classical details still in manner of Queen Anne Revival/Arts and Crafts but with a dash of Art Deco about it. The embrace by brewers in the 1920s and 30s of aspects of the neo-Georgian/classical and neo-Tudor was part of a sustained commercial policy to move pubs away from their reputation as fearful drinking dens and to make them family-friendly. This means pubs usually contained dining rooms, ideal one for the public bar and one for the saloon, as was as snugs/private bars for female customers. The Seven Stars is a late but architectural significant example of the type.
A26	Commercial St - ---	Railings to underground lavatory and tall, stout. mushroom -topped sewer ventilator shaft.
A27	43-47 Brick Lane	43, 45 and 47 Brick Lane, a group of c 1890, in simple Flemish Renaissance Revival style, each two bays wide and topped by third floor with single window set in gable. This is the same design as buildings in nearby Fashion Street, and these houses were presumably part of the uniform development.
A28	Commercial St - bollard	Cannon type bollards, of mid 19 th century date, on corner with Fleur de Lys Street
A31	76-82 Commercial Street	Much busier architecture, with tiers of arched windows, set as pairs. The south portion of Commercial Street - from Aldgate to Christ Church, was laid out in 1843 to 18 45, but this group looks later, more like it was built in the 1850s. Late C19, terrace of 3 storey workshops, painted brick, 4 paired sets of round-arched windows, moulded windows surround and cornice, formal north elevation to church yard with three bays, round arch windows, render dressings, important to setting of Christ Church and churchyard.
A33	50 Fashion Street	Early C19, 4 storeys, painted brick, on original building line before set back of 1900 building
A34	39 Brick Lane, formerly 'The Three Cranes' P.H.	Early C19, 3 storeys, three bay to Brick Lane, return elevation to Fashion Street
A37	Fashion St. - bollards	Pair of bollards set on entrance to Bazaar in Fashion Street. Clearly been recently relocated here but very good examples of cannon type with spur. Much lettering on shafts but obscured by layers of paint. Seems to state 'St. George's Pavement Commission', and date of 1850. Another in Wentworth Street, but dated 1846. Presumably all moved to Spitalfields from the parish of St. George-in-the-East.
A40	Fashion St. - bollards	Four MBS (Metropolitan Borough of Stepney) stanchion bollards.
A41	70-72 Commercial Street	A most ornate pair, much fancy brickwork including herring pattern bond in arches above windows of number 70. Presumably 1860s or 70, suggesting that some sites in the new street took considerable time to let. Late C19, 4 storey commercial, red brick with render string courses, dressings and keystones to round-arched windows, splay corner to Fashion Street, later roof extension to No.70.

Map Ref.	Address	Description
<p>B - Old Truman Brewery</p> 		
B1	150 Brick Lane ("93 Feet East")	Particularly fine is this cobbled entrance passage entered through a wide opening on Brick Lane. Here there are extensive areas of high quality cobbles -seemingly little disturbed - large granite kerb stones and a granite paved route for drays. Particularly moving is the manner in which the tough cobbles next to the granite paving have been worn over the years by the iron rimmed wheels of heavy draws. This underlines why, when lifting and moving cobbles, it is essential to put them back exactly. Any mix-up here and this pattern of usage and wear would be lost.
B2	Cooperage on Spital Street	Along east side of yard is the 'Cooperage', mid 19th century with a brick chimney at north side that must have served a large steam engine. Large opening in 'Cooperage' leads to Spital Street. In the opening good cobbling and large granite kerb stones.
B3	Truman Court	On north side of the yard is a good early (c 1840?) single storey structure that has windowless elevation to Buxton Street. Arched openings at east and west ends, each flanked by a narrow semi-circular topped window. This was a fashion pioneered by Sir John Soane in the early 19th century (see rear elevation of c 1812 of his house and museum in Lincoln's Inn Fields and his stables of 1814 at the Royal Hospital Chelsea) and were a popular part of the Italianate style of the 1840s. The west side of the yard joins buildings facing onto Brick Lane and the courts entered from Brick Lane. This is an

Map Ref.	Address	Description
		area of most atmospheric townscape that is particularly rich in early industrial architecture and urban street details.
B5	Truman Brewery Yard east of Brick Lane - surface, cobbling details	Much of the north part is cobbled in very high quality and authentic manner, with, in places, the pattern suggesting presence of now lost structures. Notably, long west side is series of areas paved with large granite slabs that are framed with areas of cobbling.
B6	Woodseer Street junction with Spital Street	Two Gothic style bollards of c 1880
B7	Woodseer Street north side	A very good early 19th century bollard near corner with Brick Lane and four others in the street, c 1850. One multifaceted bollard with stars at top. One cannon-type with spur, c 1850. One tapering obelisk bollard
B8	28 Woodseer Street, (30 metres east, in pavement)	Tall octagonal bollard with "lemon-squeezer" top
B9	Wilkes Street (north end) road surface, through Ely's Yard	North extension of Wilkes Street to Quaker Street, now in the brewery area, retains significant areas of cobbles.



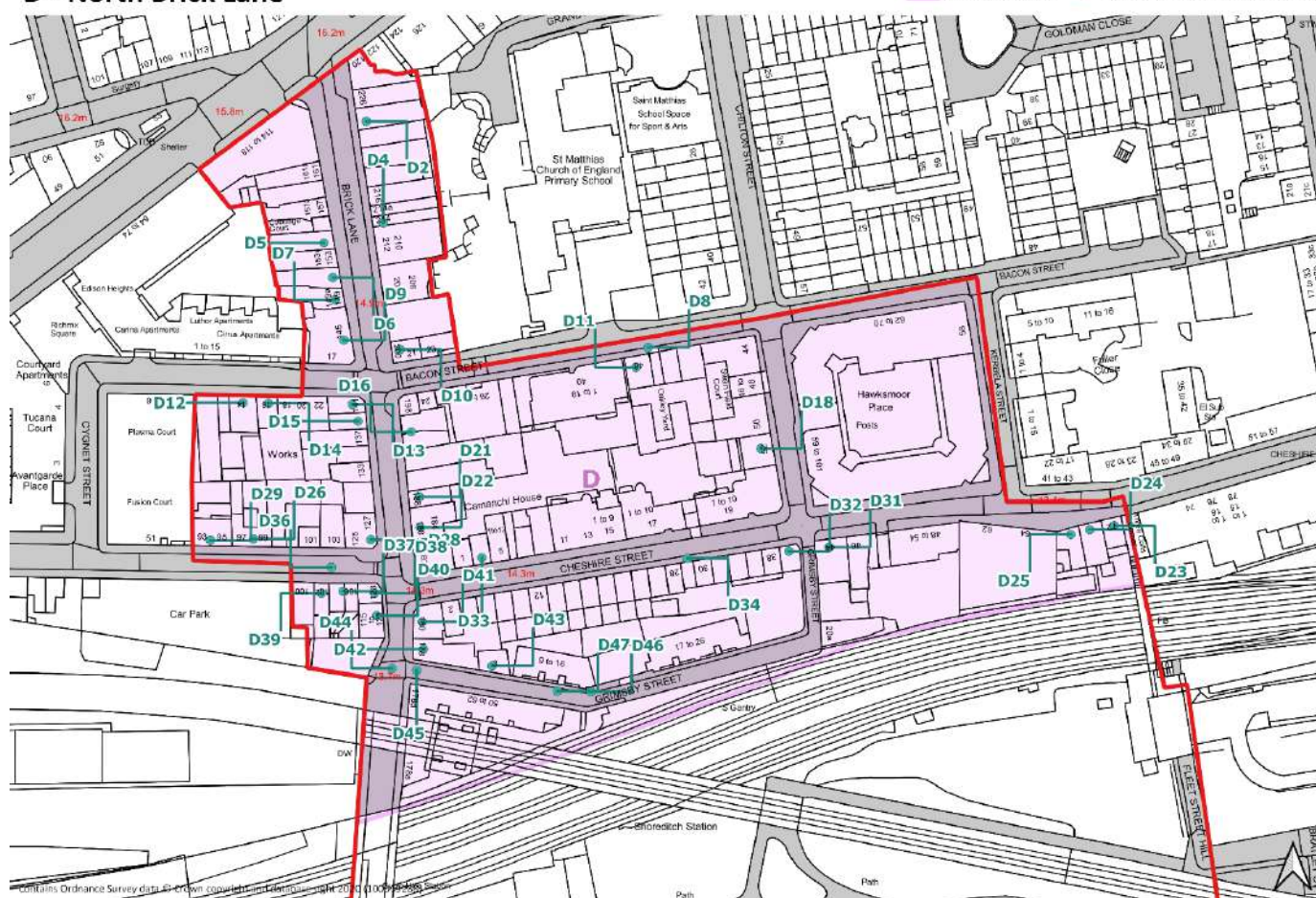
C1	Pedley Street - bollards	At junction with Brick Lane a pair of ornate late 19th cast iron bollards. Pedley Street was formerly named Fleet Street.
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Map Ref.	Address	Description
C2	Pedley Street - name plate	Cast iron name plate 'Pedley Street, E1' Perhaps early 20th century, although might be more modern.
C3	164-174 Brick Lane	160 etc Brick Lane. At Junction with Pedley Streets. See report for details. Houses and shops c 1870.
C4	160-162 Brick Lane	Good plain, mid 19th century brick-fronted pair with ground floor shops.
C5	Quaker Street - --	At junction of Quaker Street and Grey Eagle Street, a section of good cobbles show through tarmac.
C6	Quaker Street - bollard	Opposite number 66 a good cannon-type bollard, minimal in detail, probably later 19th century.
C7	43-47 Quaker Street	On corner with Grey Eagle Street, block of four-storey red brick tenements with corner shop. Modest but nicely built and few a telling details. Important street value and memorial to now lost architectural and social character of those parts of Quaker Street rebuilt in the later 19th century
C10	154 Commercial Street	Façade of cinema of 1935 on the corner with Commercial Street and Quaker Street, replaced St. Stephen's church of 1860-61 by Ewan Christian.
C11	152 Commercial Street (the former Vicarage)	Vicarage for St. Stephen's church, also 1860-1 and also by Ewan Christian. Muscular Gothic and strikingly asymmetrical with red bricks expressing aspects of structure - a very good example of the mid Victoria Gothic Revival making itself at home in the most urban of locations
C13	24 Wheler Street (formerly, "The Ship" P.H.)	With the radial corner, was 'The Ship' public house (some sources state it was 'The Jolly Weavers', not to be confused with demolished 'Weavers Arms' at 17 Hanbury Street)
C14	Wheler Street - bollards	Five very good mid to late 19th cast-iron bollards. From the north: Cannon type with spur: Inscribed in good bold, serif lettering 'St. James.' Presumably re-set here from St James's parish. Cannon type with spur: inscribed 'Dodgson, London. This refers to John Dodgson of Lower Shadwell, registered in the 1841 Post Office Directory as an 'iron and brass founder.' Cannon type with spur: Inscribed 'St. Paul. Shadwell, 1848, Bailey, Pegg & Co, 81 Bankside.' Bailey Pegg started business as founders in Wapping in 1835, later moving to Bankside. Cannon type: Inscribed 'LH'. Perhaps cast for the London Hospital estate in Whitechapel. Gothic type. Inscribed on base 'MBS' Metropolitan Borough of Stepney, so 1900 or a little later.
C15	22 Wheler Street	A much-altered group of houses of c 1830, including radial corner, with some surviving finely cut and gauged brick arches to windows. Now the oldest buildings in the street and the last of its early houses.
C19	Calvin Street, pavement lights	Pavement lights, made by Haywood, London, 1930s, some lights adjoined by small but fine, sections of sets.
C20	12-14 Calvin Street	12-14 Calvin Street - simple very late 19th century group, utilitarian and characteristic of the area.
C21	132 Commercial Street (the "Exchange Building")	Built in 1935-6 the corner with Jerome Street built and massive block to the north on the site of the former Cambridge Music Hall. This block has much Art Deco details, including squat clock tower with quadrant, fluted corners. This is linked to 116 by high level bridge over Jerome Street.
C23	Grey Eagle Street, hidden road surface	At junction of Quaker Street and Grey Eagle Street, a section of good cobbles show through tarmac.
C24	Corbet Place/Grey Eagle St - bollard	Chamfered obelisk type, inscribed BW WB, like bollard in Crispin Street, c 1860?

Map Ref.	Address	Description
C25	116 Commercial Street	Built in 1922-7 for Messrs Godfrey Phillips, tobacco and cigar merchants, to designs of W. Gilbee Scott and B.W.H. Scott.
C26	114 Commercial Street (All Saints)	Built in 1935-6 on the corner with Jerome Street built and massive block to the north on the site of the former Cambridge Music Hall. This block has much Art Deco details, including squat clock tower with quadrant, fluted corners. The scale and design of the blocks wonderfully out of sympathy with Spitalfields neighbours and area's established character. Yet know it is part of the scene, appreciated for its Art Deco flourish and jazzy style.

D - North Brick Lane

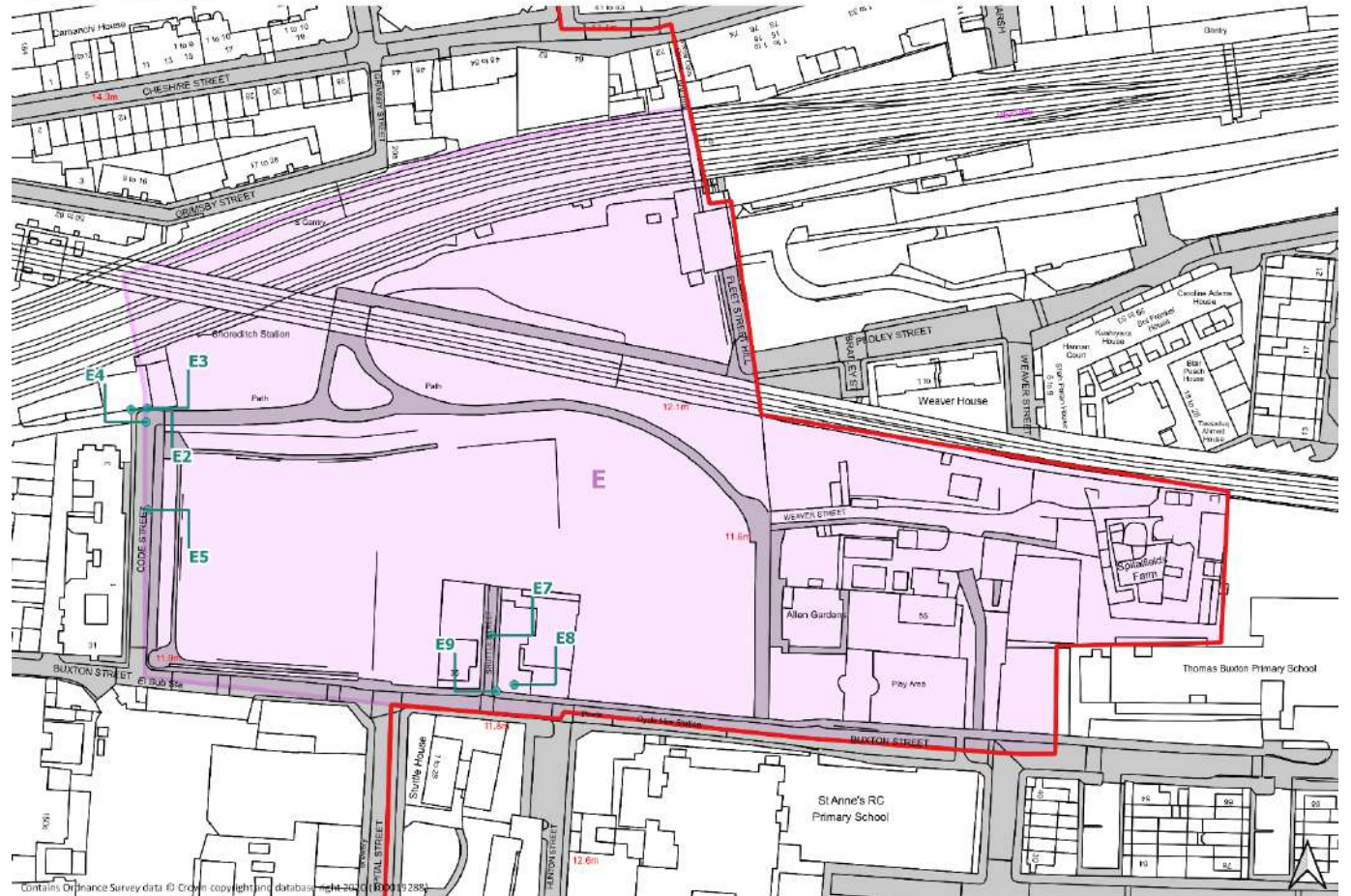
Character Area Assets of Historical Interest



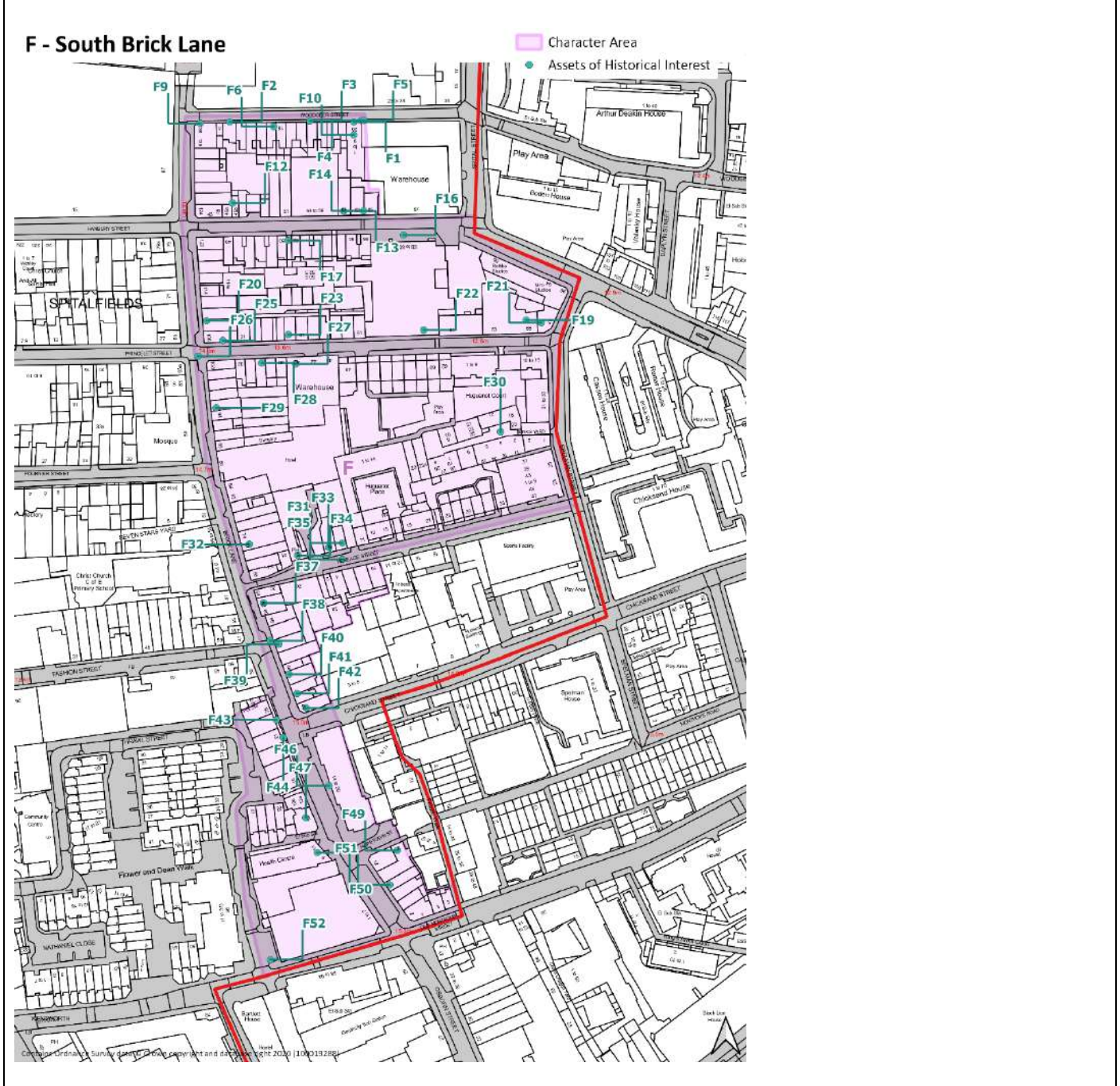
D2	222-226 Brick Lane (even)	Late C19, group of 3 workshops, with single wide tripartite 1st and 2nd floor windows, yellow brick, render dressings
D4	210-220 Brick Lane (even)	C19, terrace of six houses, 4 storey, pair windows, plain brick, gauged arches
D5	155 Brick Lane	Late C18/early C19, 3 storey house with modern shop, yellow brick with gauged brick arches to windows, Beigel Shop is iconic retail use on ground floor
D6	151 Brick Lane	Late C19 (refronting?), 3 storey yellow brick with red brick dressings, timber shop front
D7	149 Brick Lane	Badly rebuilt replica of weavers house of c 1700

Map Ref.	Address	Description
D8	Bacon Street road surface	Granite sett crossover in pavement with granite curved corner stones, o/s no.46
D9	143-147 Brick Lane	1920s workshop, 4 storey, red brick, wide render bands, wide metal windows.
D10	200 Brick Lane	N.E. corner with Bacon Street, c.1820, 4 storey, yellow brick, repaired, red brick arches
D11	46 Bacon Street	Group of three late C19 tenement, 3 storey plus mansard, recently refurbished, yellow brick with red brick dressings, Stedman House with central front door and windows either side, to the east, entrance to Oakley Yard, and wide timber doors to ground floors. Oakley Yard with 3 storey C19 workshops.
D12	14 Bacon Street	Early C20 warehouse, 4 storey, red brick, wide multi-paned Crittall windows, loading doors to 1st, 2nd and 3rd floors. Exposed west flank elevation retains fireplaces of former No.12, C18 house.
D13	141 Brick Lane	Mid C19 house and shop, 3storey, 3 bays including curved corner with Bacon Street, decorated stucco window surround and hoods, 1st floor street sign 'BACON ST. E.!'.
D14	16 Bacon Street	C18 house, 3 storey, yellow stock, timber sashes to 1st and 2nd floors
D15	139 Brick Lane	Early C19, 3 storey, plain render window surrounds and cornice, 1st floor street sign 'BRICK LANE E.1.
D16	194-196 Brick Lane	Pair of 4 storey C19 houses, timber sash windows. At first floor retains portion of façade of c 1765.
D18	52 Chilton Street ("St. Matthias Church House")	52 Chilton St (St Matthias Church Hse). Built in 1887 as the hall for the now long lost St. Matthias Church that stood opposite, on the corner with Cheshire Street. The foundation stone was laid by Princess Christian, the third daughter of Queen Victoria who, born Princess Helena, in 1866 married the impoverished and somewhat elderly Prince Christian of Schleswig-Holstein. A somewhat neglected and from time to time humiliated member of Victoria's family, Princess Christian dedicated her official life to charity and to patronising of good causes - such as women's rights and the Red Cross. So it is not surprising that she was involved in the church hall building enterprise off Brick Lane. 1887 marked the fiftieth year of Victoria's reign - as is recorded on the foundation stone - so this building was, in its small way, part of the programme of London's Jubilee celebrations. The building was designed in a visually pleasing and picturesque - if far from historically correct - Tudor revival style, with drip-moulds to windows, large, off centre gable, and Tudor arch to the main door. The architect was W. Reddall, who was probably also the designer of the nearby 2 to 40 Cheshire Street. Built in c 1870, these are in the late Georgian classical tradition. 52 Chilton Street is playfully ornamental and an historically important link with Queen Victoria's family and her 1887 Jubilee celebrations in East London.
D21	188 Brick Lane	C18, 4 storey house, multi-pane timber sash windows
D22	184-186 Brick Lane	Late C19 tenement, 4 storeys, plus modern roof extension
D23	72 Cheshire Street	Late C19 refronting, 4 storey red brick with decorative terracotta pediments to first floor windows facing street and side alley
D24	70 Cheshire Street	Mid C19, 3 storey plus mansard, pair of sash windows to ground floor, square windows to 1st and 2nd with stucco surrounds, cornice

Map Ref.	Address	Description
D25	68 Cheshire Street	Possibly C18 rebuilt in 1920s, 3 storey, yellow brick with red brick soldier course arches, ground floor timber shop front
D26	97-99 Sclater Street (odd)	Pair of weavers houses in Sclater Street (observe wide workshop windows and small windows lighting staircase) much altered but probably c 1718 in origin but largely rebuilt in late 18th and early 19th centuries. House in foreground largely refronted poorly- about 8 years ago (shocking pointing). Cobbles mostly good if badly patched. An important street and important survival, important vista, threatened by Goodsyrd proposal.
D28	125 & 127 Brick Lane	C18 altered, 3 storey, stock brick, single wide window to 1st and 2nd floor with side lights, group value with No.125 (Grade II) adjacent
D29	93-95 Sclater Street (odd)	Late C19, tenement, 4 storey, red brick, 4 bays wide
D31	44 Cheshire Street	Imposing 3 storey, c.1860, former pub, 3 bays, yellow stock brick, timber windows to 1st and 2nd floors, segmented brick arches, timber shop front, side elevation to Grimsby Street and rear elevation visible from there
D32	40 Cheshire Street	Seemingly identical to the statutorily listed terrace of Nos 2-38 (1870 by Reddall & Cumber), and possibly a mistake in the listing address. Forms the eastern end of the terrace and the return side elevation to Grimsby Street. Good timber shop front, restored by BDP in 1991.
D33	3 Cheshire Street	C19, heavily restored, 3 storey, yellow brick, C20 concrete lintel, 2 bays, with wide windows, modern frames
D34	Cheshire Street road surface o/s 28-30	Granite sett crossover, re-laid, in pavement
D36	Sclater Street road surface	Sclater Street, from Brick Lane running west to junction with Cygnet Street, granite sett road surface, with some poor patching
D37	104-106 Sclater Street (even)	C19, pair of 4 storey houses, serrated decoration to 1st window heads, as in nos 119-121 Brick Lane, 2nd and 3rd floors rebuilt C20
D38	123 Brick Lane	Part of group with Nos 104-106 Sclater Street, C19, 4 storey, C20 repairs, splay to corner with street sign 'SCLATER ST. E.1.
D39	102 Sclater Street	C19 house, 3 storeys, stock brick, C20 window heads
D40	119-121 Brick Lane	A good late 19th century group. Number 119 and 121 retain substantial remains of early shop fascia and have window lintels with unusual serrated soffits., The group frames a characterful view south along Brick Lane to Truman's Brewery.
D41	180 Brick Lane	Modest, polite, late 19th century elevation. Very good background architecture.
D42	178 Brick Lane	Corner with Grimsby Street, late C19, 4 storey tenement, 3 bays to Brick Lane, 5 to Grimsby Street, red brick with decorative keystone window heads to 1st and 2nd floor
D43	3 Grimsby Street	Late C19 workshop, part 2, part 3 storey, yellow brick with pale gault brick dressings, wide workshop windows with curved heads
D44	Brick Lane road surface at junction with Grimsby Street	Granite sett crossover
D45	Grimsby Street street sign	Cast-iron street sign 'GRIMSBY ST. E.2.'
D46	Grimsby Street pavement	Granite curved and splayed corner slabs to crossover
D47	Grimsby Street road surface	From Brick Lane to Cheshire Street, granite sett road surface, including late C19 metal manhole cover in centre of road way

Map Ref.	Address	Description
<p>E - Hare Marsh</p>  <p>Character Area Assets of Historical Interest</p> <p>Contains Ordnance Survey data © Crown copyright and database right 2010 (10001288)</p>		
E2	Old Railway Station, Pedley Street	Single storey ticket office to former Shoreditch Station, on the East London underground line serving a low level platform. Opened 1875, closed 2006. A simple elegant classical brick-built pavilion. Now derelict and covered with graffiti. A handsome building that makes a major contribution to its location and forms an important part of the transport history of London. Should be grade II listed and repaired.
E3	Pedley Street - bollard	By entrance to station, a third ornate bollard suggesting all three might have been installed by railway company.
E4	Pedley Street - road surface	At west end on Pedley Street at junction with Bratley Street- large cobbled area. Very good, looks early but with curiously wide joints.
E5	Code Street - road surface	Cobbled in splendid fashion, plus good kerb stones. Junction of Code Street cobbles with remnants of Pedley Street cobbles memorable. Set on different axis so meet at right angle in skilled interwoven herring-bone pattern. It makes a fine urban ornament,
E7	Shuttle Street road surface	Between former Vicarage and No.37, granite sett road surface, running north for 25 metres up to boundary with public open space, and beyond, with granite kerbs.
E8	37 Buxton Street (Old St. Patrick's School)	Simple but very sound mid 19th century Gothic Revival building. Brick-built with stone detailing. Function is expressed through design, in thorough Gothic Manner. Large windows to upper level classrooms set over low

Map Ref.	Address	Description
		windows lighting more mundane spaces/ Simple Gothic door -presumably leading to stairs to classroom. Lower level of facade wrought of dark blue, glazed engineering brick, tough and easy to cleanse of the horse-dung that passing traffic would have splattered over the lower portion of the façade.
E9	Buxton Street - bollards	Two cast-iron cannon bollards on pavement, flanking entrance to the above



F1	Woodseer Street - bollard	One octagonal and one cannon bollard
F2	Woodseer Street	O/S No.6 on pavement, cast-iron oblong bollard with round top, inscribed MBS
F3	Woodseer Street - bollards	A fine and mixed array of early bollards. A very good early 19th century bollard near corner with Brick Lane and four others in the street, c 1850.

Map Ref.	Address	Description
		One multifaceted bollard with stars at top. One cannon-type with spur, c 1850. One tapering obelisk bollard. Two Gothic style bollards of c 1880 (as in Wheler Street) in Woodseer Street and another two at junction with Spital Street.
F4	Woodseer Street bollard at 28 Woodseer Street, on pavement, kerbside	Cast-iron square fluted bollard
F5	Woodseer Street bollard at 28 Woodseer Street, (3 metres east, in pavement)	Octagonal bollard
F6	4 - 28 Woodseer Street *	A uniform and very handsome two storey terrace of c 1840. Early C19, two storey brick terrace of houses, with blind decorative panels in brick parapet concealing valley roofs. Handed front doors
F9	138 Brick Lane	On flank wall, cast iron street sign 'WOODSEER ST.E'
F10	28 Woodseer Street	Late C19 warehouse, 4 storey, large multi-pane metal windows, tall ground floor with entrance archway to rear
F12	45 Hanbury Street	A narrow, single story structure that appears to be an extension of the 1903 terrace on Brick Lane. In c1919 was the premises of J.H. Fisher, umbrella makers.
F13	61 Hanbury Street	Late C19, 4 storey, 3 bays, painted brick, timber sashes
F14	63 & 65 Hanbury Street	Late C19, 4 storey workshops, wide 1st floor windows, 63 with recessed bays and ornamental details. A pair of two bay houses, faced with yellow brick, towards the east end of the street, c 1880-90, presumably designed as shops/workshops with accommodation above. Nice touch is the single wide, first floor window with cast iron stanchions with a stone or cast stone lintel set below a red brick relieving arch - all in Gothic Revival spirit of structural polychromy and honest expression of structure. Number 63 housed not a shop but the Black Lion public house that seems to have closed just before 1921.
F16	Hanbury Street, pavement south side	O/S Second Home, two pairs of curved corner slabs in pink (Aberdeen) granite to two former cross-overs
F17	40-66 Hanbury Street	1906 by J.R.Moore-Smith for Maurice Davis, developer, 3 and 4 storey red brick tenements over shops, recessed entrances to flats, flamboyant Dutch crow-stepped gables with ball finials. A uniform group all topped with steep crow step gables of most dramatic silhouette. Number 52 incorporates entry to yard. The group makes a striking urban vista, especially when viewed from the distant west end of Hanbury Street. All c1890 - and the mostly visually arresting Flemish Renaissance Revival group in Spitalfields, despite slightly industrial quality of construction and minimal detailing or ornament. Group has major visual presence and is of great town-scape significance.
F19	65 Princelet Street	Mid C19, earlier than its neighbours, 2 storey with simple gable end
F20	106-112 (even) Brick Lane & 27 and 29 Princelet Street	Late 19c tenements, 3 and 4 storey, yellow brick with red brick dressings. Shadow of painted advertisement on Princelet Street elevation. Good brick built block with delicate brick details, including dentil string course c 1880. A strong composition.

Map Ref.	Address	Description
F21	41 Spelman Street (formerly "The Alma" P.H.)	Early C20, 3 storeys with dramatic modern roof extension
F22	57-63 Princelet Street	1920s, 4 storey workshops, large metal windows, ground floor shops or showrooms
F23	31-51 (odd) Princelet Street	Late C19, 3 storey terrace of eleven houses, yellow brick with render dressings, 4 with commercial ground floor, 7 all residential with Venetian ground floor windows. Timber sashes. A uniform group of most utilitarian houses - a few near Brick Lane with shops - perhaps built for shared occupation. Probably of late 1870s date, if so perhaps conforming to byelaws framed in 1875 Public Health Act, governing design and construction of terrace houses for 'labouring; classes'. Wide ground floor windows incorporating cast-iron stanchions of ornate design and stone or cast-stone window lintels as recommended by the byelaws. An important group, needs to be explored and investigated.
F25	29-31 Princelet Street	A good mixed use building - tenements and shops/workshops - with ornate banded brickwork. C 1880.
F26	Brick Lane - bollard	Bollard, corner of Brick Lane with Princelet Street (on east side of Lane). Inscribed Christ Church Middx, 1818. This is only surviving bollard to have this date not 1819.
F27	42 Princelet Street	Early C20, commercial workshops, 2 and 4 storey, render, painted black, modernised Art Deco
F28	32-40 (even) Princelet Street	Late C19 4 storey tenements, part of 88-104 Brick Lane development
F29	88-104 (even) Brick Lane	A four storey group of 1890, with ground floor shops, including Katz. Visually strong group that does much to sustain established visual architectural and use of central portion of Brick Lane
F30	Links Yard road surface	Granite sett cobbles and massive granite running slabs in entrance yard, group of 2 and 3 storey brick workshops and factory buildings, with brick chimney
F31	7 & 9 Heneage Street	Pair of early C18 houses, 3 storey, brick with timber sash windows, sensitively and imaginatively restored and converted 1982 by MacCormack Jamieson Pritchard, retaining much original internal fabric and plan-form
F32	66-80 (even) Brick Lane	Brick fronted uniform terrace of c 1870. Simple cornice, with bricks set diagonally. Oddly numbers 72 and 74 have flat topped windows while windows in rest of group are segmental, But 72 and 74 also stuccoed while rest of group have brick fronts. So perhaps altered, but this little variety adds interest and picturesque charm. The group has dignity and adds greatly to the background/contextual character of this portion of Brick Lane.
F33	5a & 5b Heneage Street ("Brewer's House")	Early C19, 3 storey, 2 bays, plain painted brick frontage
F34	3 Heneage Street ("Pride of Spitalfields" P.H.)	2 storey, C20 front concealing older fabric behind which belonged to the White Lion Brewery.
F35	Heneage Street, entire length from Brick Lane to Spelman Street	Granite sett road surface, granite sett crossovers in pavements O/S Nos 5, 9, and 33, and on south side with pink granite corner stones
F37	62 Brick Lane	Late C19, 4 storey, 3 bays, yellow brick with curved window heads, red brick arches, symmetric, former PH? Prominent in street because of forward building line

Map Ref.	Address	Description
F38	Brick lane street sign	Cast-iron street sign on side elevation 'FASHION ST. E'
F39	50-56 Brick Lane	Group of four early C20, 3 storey plus attics, neo-Georgian with Venetian-style 1st floor windows, brick, but three facades painted. Possibly a re-fronting of old houses, given double-pitch mansard, visible from Fashion Street.
F40	46-48 Brick Lane	Built as a small scale but showy cinema, Faience clad, Art Deco in feel, built 1935, designed by Leslie Kemp & F.E Tasker and called the 'Mayfair' - as emblazoned on its façade. Good, and now rare, example of an Art Deco local, small scale cinema.
F41	42-44 Brick Lane	1920s, 3 storey, red brick, arched pediment decoration
F42	40 Brick Lane, north corner with Chicksand Street	Mid C19, 3 storey, one bay to Brick Lane, with modernised first floor open, splay corner bay, four bays to Chicksand Street, plus two bays of 2 storeys, painted render, parapet cornice, timber sash windows
F43	Brick lane street sign	'THRAWL ST E', fixed to first floor flank wall, historic eastern end of Thrawl Street,
F44	Brick Lane - bollard	Cast-iron cannon bollard, probably a pair with the one on the other one opposite on the west side of Brick Lane, dated 1819.
F46	Brick Lane - bollard	Cast iron bollard, square with chamfered top, with rope marks on sides o/s 13 Brick Lane
F47	13 Brick Lane ("Shaad Restaurant", formerly "The Frying Pan" P.H.)	formerly The Frying Pan Public House, 1891 by S.W.Grant,, 3 storey, render with rusticated quoins and decorative window surrounds and cornice, and ornamental terracotta gable and plaque to curved corner with Thrawl Street
F49	2 Hopetown Street	Early C19 three bay, 3 storey house with ground floor shop front, sole fragment of former terrace. Historic interest
F50	9-11 Brick Lane ("Spitalfields Health Centre")	Spitalfields Health Centre, 1984, by John Allan architects with Shephard, Epstein & Hunter. Cited in The Buildings of England as a good example of new type of health centre, with "an impressive prow-like frontage to Brick Lane".
F51	2-12 (even) Brick Lane, & 3-5 Montague Street	C.1950, 3 storey building with flats above shops, upper floor remarkably intact, brick, simple detailing including slim projecting framing to window reveals, entire block from Montague Street to Chicksand Street, good example of austere post-war rebuilding.
F52	Bollard at entrance to Thrawl Street, in pavement,	Cast-iron bollard, square, chamfered top, with rope marks on two sides

Map Ref.	Address	Description
<p>G - Old Market</p> <p>Character Area Assets of Historical Interest</p>		
G1	Brushfield Street, near junction with Commercial Street	Strip of historic granite setts, relaid as part of traffic calming measures.
G2	Brushfield Street, south side pavement on east corner with Crispin Street: south side pavement 20 metres west of junction with Commercial Street; north side pavement opposite central entrance to Fruit and Wool Exchange;	Three lamp posts, late C19, all same design, ornate castings, diagonal floral bands and fluted column, with BW WD and crest relief depicting St Martin and the beggar, modern top bracket and light fitting. Identical to statutorily listed lamp post in pavement in front of No.38 Brushfield Street
G3	Brushfield Street, Fruit and Wool Exchange	1929 by Sydney Perks for City Corporation, façade only surviving redevelopment for office 2019 by Bennetts Associates

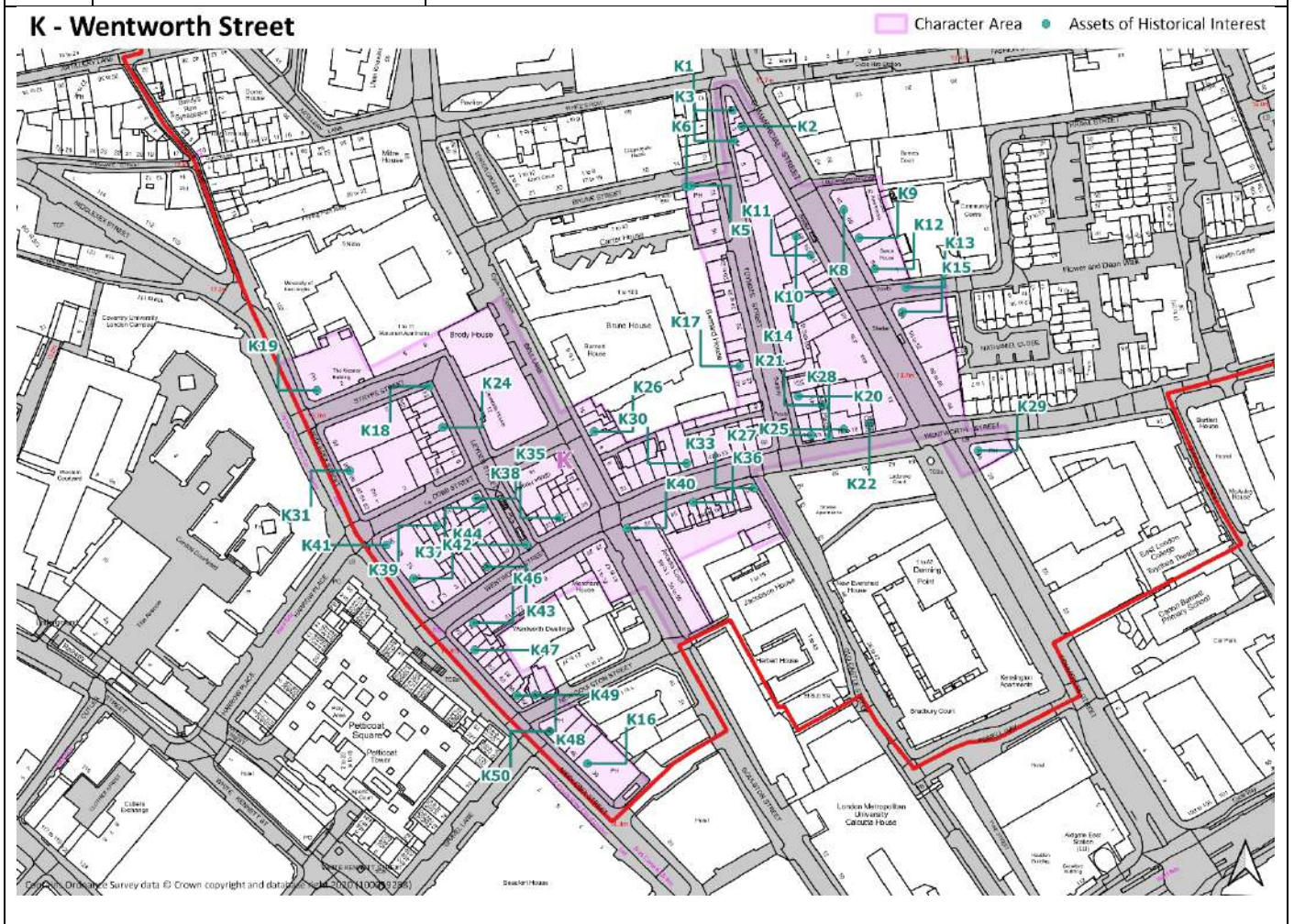
Map Ref.	Address	Description
<p>H - Norton Folgate</p>		
H1	4-8 Elder Street	Elder Street, Nos 4-8 (even), late C19 four storey workshops, with shop fronts. Locally listed buildings.
H2	Fleur-de-Lis Passage, from junction with Blossom Street to Shoreditch High Street	C19 York stone paving slabs to passageway
H3	Fleur-de-Lis Passage, eastern end at junction with Blossom Street	Two cast-iron cannon bollards
H4	12 & 13 Blossom Street	Late C19, part 3 storey, part 4 storey warehouse, blue engineering brick to ground floor, upper floors yellow stock brick, square window openings with C20 lintels, full height loading bay doors and hoists.
H5	16-19 (consecutive) Norton Folgate	Terrace of four houses, late C19 red brick fronts, with moulded brick cornice and string courses, each two bays, timber sash window with multi-pane upper sash, single pane lower sash, ground floor shops
H6	15 Norton Folgate	Late C18 house, 3 storey with mansard and dormers, two bays, ground floor shop front, all except façade demolished 2019
H7	27 Blossom Street	Mid C19 warehouse, façade only (remainder demolished 2019), 4 storey, yellow stock brick

Map Ref.	Address	Description
H8	12 & 13 Blossom Street	Mid C19 warehouse, 4 storeys including high ground floor, yellow stock brick, segmental arches to window heads, 2 full height loading bays with cranes, return frontage to north side of Fleur-de-Lis Passage, granite sett yard to east frontage forecourt (not public highway)
H9	Folgate Street, north junction with Norton Folgate	Cast-iron cannon bollard in pavement
H10	5-7 Folgate Street	5-7 Folgate St. This is the group dated 1904 that forms part of the British Land site (all numbers now obscured). Handsome Queen Anne Revival group with good details, including a panel with initial T for Tillard estate.
H11	6-8 Folgate Street	6-8 Folgate Street are a very good pair of c1820 houses, with fine brickwork. Only facades survive after being converted to housing. Should most certainly be on the local list.
H12	9-11 Folgate Street	The former Pewter Platter now Water Poet PH on corner with Blossom Street, was built c.1900. A handsome building. The corner of the PH bears a large number 9. The building is on the Local List.
H13	38 Spital Square	Late C19 warehouse, 4 storeys, yellow brick with red brick arches to east elevation, west elevation to Spital Yard rebuilt with modern roof storey, cast metal street sign at 1st floor level 'SPITAL YARD, E.1.'
H14	Spital Yard	Granite setts to whole of carriageway

Map Ref.	Address	Description
<p>J - Artillery Passage</p> <p>Character Area Assets of Historical Interest</p>		
J1	Brushfield Street / Gun St. - bollard	Cast-iron cannon bollard in pavement at eastern junction with Gun Street
J2	Brushfield Street / Gun St. - bollard	Cast iron bollards in pavement next to listed lamp-post at western junction with Gun Street
J3	48 Brushfield Street	Late C18, 3 storey, three bays, yellow stock with gauged brick arches to windows 2 X 2 timber sashes
J4	50 Brushfield Street	C18, 3 storey, single bay, brick with ground floor shop front, group value as part of terrace
J5	44-46 Brushfield Street	C18, re-fronted C19, 3 storeys, stock brick with red brick window arches, ground floor shop front, group value in terrace
J6	Brushfield Street / Steward St - bollard	Cast-iron cannon bollards in pavement at eastern junction with Steward Street
J7	Brushfield Street / Steward St - bollard	Cast-iron cannon bollard in pavement at western junction with Steward Street
J8	45 Crispin Street	Late C18, 3 storey plus mansard with wide single dormer, windows of different sizes on 1st and 2nd floors
J9	Brushfield Street / Fort St - bollard	Cast-iron cannon bollard in pavement at corner of eastern junction with Fort Street
J10	Crispin Street - bollard	Cast-iron square fluted bollard in pavement O/S No.46, inscribed BW WD

Map Ref.	Address	Description
J11	46 Crispin Street	Late C18, 3 storey, two bay with mansard, 6x6 pane timber sash windows, noteworthy shop front – O’Donovan Bros’
J12	47-49 Crispin Street ("Oakwood Lofts")	Late C19, commercial, 4 storeys, 5 bays, symmetric with central front door up steps, yellow brick with red brick string courses and window surround, exposed steel lintels, probably C20 repairs.
J13	Artillery Lane / Steward St. - Bollard	Cast-iron bollard in pavement at eastern junction with Steward Street
J14	Artillery Lane / Steward St. - Bollard	Cast-iron bollard in pavement at western junction with Steward Street.
J15	35 Artillery Lane	Late C19 warehouse/commercial, occupying the obtuse corner of Artillery Lane and Steward Street, with three bays to each street. Four storeys plus modern roof extension, late C20 alterations to 1st floor windows. Group value in street despite modern interventions
J16	42 Artillery Lane	C19, 3 storeys plus dormers, three bays, yellow brick
J17	50 Crispin Street	Late C19 warehouse, 4 storey, plus modern set back roof extension, five bays wide, symmetric, yellow brick with red brick dressings, modern windows
J18	44 Artillery Lane	C19 warehouse, 4 storey, occupies pivotal position in obtuse angle of street, prominent cupola visible down Steward Street
J19	38-40 Artillery Lane	C19, 3 storey plus roof, white glazed bricks, ornate timber shopfront (modern)
J20	Artillery Lane / Sandys Row - Bollard	Cast-iron cannon bollard in City of London livery, in pavement at eastern corner of junction with Sandys Row
J21	32-34 Artillery Lane	Late C19, paired of houses with shops, 3 storey plus mansard, yellow stock brick, Venetian windows with side lights, ornate red brick shallow curved arches to window heads, keystones and string courses, splay corner to Sandy’s Row
J22	Artillery Lane / Gun St. - Bollard	Two cast-iron cannon bollards in pavement at eastern junction with Gun Street, the one nearest the corner inscribed ST GEORGE’S PAVEMENT COMMISSION and JAMES on other side. Cannon type with spur: Inscribed in good bold, serif lettering ‘St George Pavement Commission’.
J23	Artillery Lane - façade	At eastern junction with Gun Street, retained façade of late C19 pub, four storeys with gables to Gun Street and Artillery Lane, brick with stone dressings. Group value to street, and historical associations
J24	1 Sandy's Row	Early C19, stock brick, 3 storeys, one bay wide, with 2nd floor wide opening, timber shop front. Side elevation at odd angle to the street., single storey brick wall with access door enclosing side yard, adjoining synagogue
J26	48 Artillery Lane	Dome House, mid C18, originally chapel, used as synagogue 1896-1948, seven bays, with large round-headed windows, three door with timber door cases and front steps, symmetrically arranged, prominent roof lantern (oddly off-centre, Buildings of England)
J27	11, 12 & 13 White's Row	Group of three C19 town houses, 3 storey plus mansards, forming corner with Toynbee Street
J28	Parliament Court, east range	Late C19, or early C20, commercial, three storeys with warehouse doors on upper floors, white glazed brick with dark plinth
J29	Artillery Lane / North side - Bollard	Pavement between Gun Street and Crispin Street, three metal bollards, oblong with curved tops, inscribed MBS (Metropolitan Borough of Stepney), pre-1965, utilitarian design but historic interest. N.B. in the vicinity including

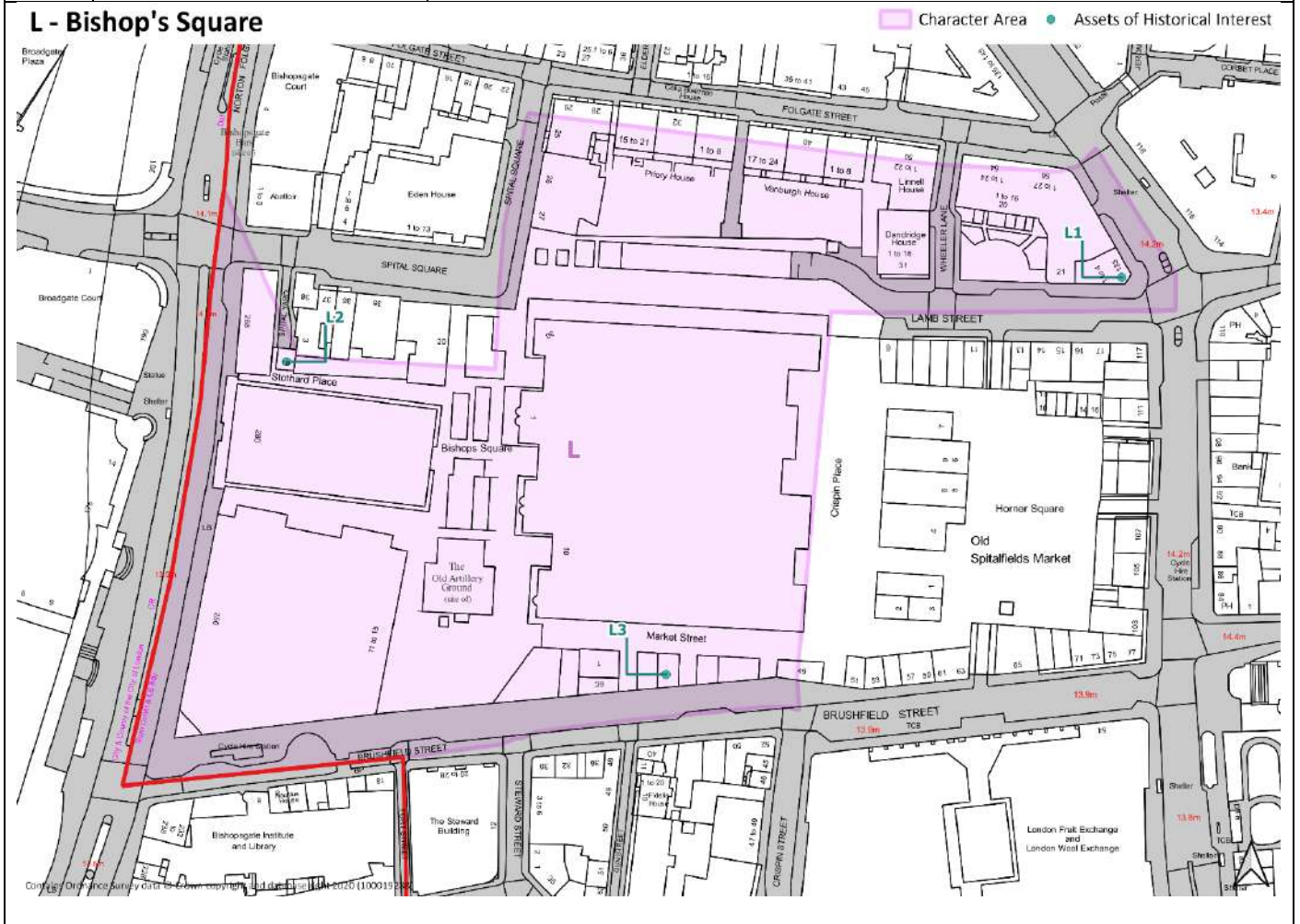
Map Ref.	Address	Description
		south side pavement seven similar design bollards inscribed LBTH, date unknown but clearly an attempt to continue MBS tradition.
J30	5 & 5a Sandy's Row	Early C19, 3 storeys, stock brick, timber sash windows, timber shop fronts
J31	11 Artillery Passage	Early C19, 3 storey, three bays wide, with wider central bay, yellow stock brick, timber shop front
J32	12 Artillery Passage	Early C19, 2 storey, yellow stock brick, timber sashes, shop front
J33	12a Artillery Passage	Early C19, 2 storey, 1st floor pair of 2x2 timber sash windows
J34	4-10 (even) Toynbee Street	C19, possibly C18, terrace of four 4 storey houses with ground floor shops, yellow brick with red brick segmental window arches and banding, forming corner with Brune Street
J35	Artillery Passage	Riven York stone paving to entire length of the Passage
J36	Sandys Row - Bollards	Two cast-iron bollards, similar but unusual C19 tall oblong design, one in pavement outside No.16 the other in the centre of paved entrance to Artillery Passage
J37	66-68 Bell Lane	c.1930 three storey purpose-built housing by Stepney borough, austere classical detail, important corner position on corner of Bell Lane, White's row and Tenter Ground.
J38	1-3 & 5 Tenter Ground	c.1900, three storey workshops, colourful detail, with white stone, red, blue and yellow brick.
J39	16 Brune Street	Late C19, five storey warehouse, yellow brick, loading bays
J40	7 Sandy's Row	Late C18 but rebuilt late C20, 3 storeys, purple stock brick, timber sash windows, modern fabric but historic site
J41	17-19 Brune Street	Two steel bollards in pavement O/S Nos.17 – 19, Oblong with rounded tops, marked 'MBS' Metropolitan Borough of Stepney. Probably 1930s. Historic value
J42	9-13 Sandy's Row	Early C19, terrace of three 3 storey houses with ground floor timber shop fronts, yellow brick with red brick window arches and swags, 2nd floor windows within brick gables, two square headed, one Dutch headed.

Map Ref.	Address	Description
<p>K - Wentworth Street</p> 		
K1	79 Commercial Street ("Eyediology")	Number 79 marks the corner with Toynbee Street, has a wedge-shaped plan and presents a very short bevelled, one window-wide elevation to the north. A visually striking composition and, intended or not, contrives to give the impression that this building is something of a portal to the long straight portion of Commercial Street that stretches south to Aldgate. In townscape terms this building is of vital importance.
K2	77 Commercial Street	Mid/late C19 3 storey commercial, classical moulded window surrounds, quoins and cornice, 3 bays to Commercial Street, one narrow bay to corner with White's Row, and rear elevation to Wentworth Street, occupying an unusually narrow site at an important junction.
K3	3 & 3a Toynbee Street	Mid C19 tenement, 4 storeys with three bays, plus 3 storey single bay on north side, plain stock brick with red brick window arches
K5	Brune Street - coal hole	Coal-hole cover in York stone slab in pavement on south side O/S Duke of Wellington PH
K6	Brune Street - bollard	In pavement near corner with Toynbee Street O/S Duke of Wellington PH, metal bollard marked MBS
K8	60-62 Commercial Street	Late C19 4 storey commercial, yellow brick with red brick window arches, splay corner and return frontage to Lolesworth Close south side
K9	58 Commercial Street	Mid C19, 3 bays, with C20 double-height workshop front, classical detail above with pediment. The Buildings of England (page 413) mentions

Map Ref.	Address	Description
		occupation by iron tube make, John Russell, with name faintly visible on pediment.
K10	61 Commercial Street	Late C19 4 storey commercial, curved window arches, southern survivor of original terrace running north
K11	57-59 Commercial Street	Late C19 4 storey commercial, matching pair, each 2 bays wide, with classical detail to windows
K12	56 Commercial Street	1920s 4 storey commercial, red brick, multi-paned metal windows, on north corner with Thrawl Street.
K13	Thrawl Street - road surface	From junction with Commercial Street to junction with Nathaniel Close, granite setts partly exposed
K14	45-55 Commercial Street ("Norvin House")	Late C19, commercial 4 storey, symmetric composition with central 3 bay portion rebuilt after WWII, but side wings to north and south intact, each of 4 bays, yellow brick with red and black brick details including detailed string courses.
K15	54 Commercial Street	Late C19 5 storey warehouse, red brick, paired windows, except 4th floor with wide gothic arches openings, splayed corner and longer frontage to Thrawl Street.
K16	36-48 Middlesex Street	Post 1883 widening of street by Metropolitan Board of Work, terrace of warehouse, 4 storeys, with pairs of double height pilasters marking entrances and loading bays, timber sash windows and loading doors
K17	Toynbee Street, west side, Bernard House	4 storey range, part of Holland Estate with similar details to other blocks, ground floor shop/workshop units facing street
K18	Strype Street - Street sign	Cast iron street sign "STRYPE STREET" at 1st floor level at junction with Leyden Street
K19	2 Strype Street	Including No.2 Strype Street, dated 1901, commercial, 5 storey, red brick with render window heads, cornice, ground floor doorcase and pilasters, shaped gables, loading bays with cranes to both Middlesex and Strype Streets, splayed corner
K20	37, 39 and 41 Toynbee Street	Part of 1930 LCC Holland Estate development with similar details, three storeys plus roof
K21	Anne's Place coal hole	Decorative coal hole cover in pavement
K22	Rose Court	C19 York stone paving slabs, to full width of Court, extending beyond gates onto the private forecourt
K24	9-23 (odd) Leyden Street	C.1900 by James Hood & Son, 4 storey red brick terrace with fine detailing, including good shopfronts, pilaster and moulded cornice, with return side frontages to Cobb Street and Strype Street, including blind windows with matching details. Fine example of model development, recently restored
K25	75 Wentworth Street	Mid C19 plain stock brick, group value with No.79
K26	8-16 Bell Lane (even)	Single storey shops attached to Brune House and part of Holland Estate
K27	71 & 73 Wentworth Street	Part of 37-41 Toynbee Street, and same as Nos 33-59 Wentworth Street, see above
K28	Anne's Place street sign	Old cast iron street sign to east flank wall
K29	40 Commercial Street, ("Culpeper P.H.")	Originally Princess Alice PH, built 1850, but rebuilt by B.J. Capell for Truman's brewery in 1883 (Buildings of England); paired first floor windows, fine pub front with tiling, pavement lights in iron frames. Important corner with Wentworth Street. 'Commercial' Gothic in detail, with lots of terracotta ornament. A most handsome work that holds the corner with

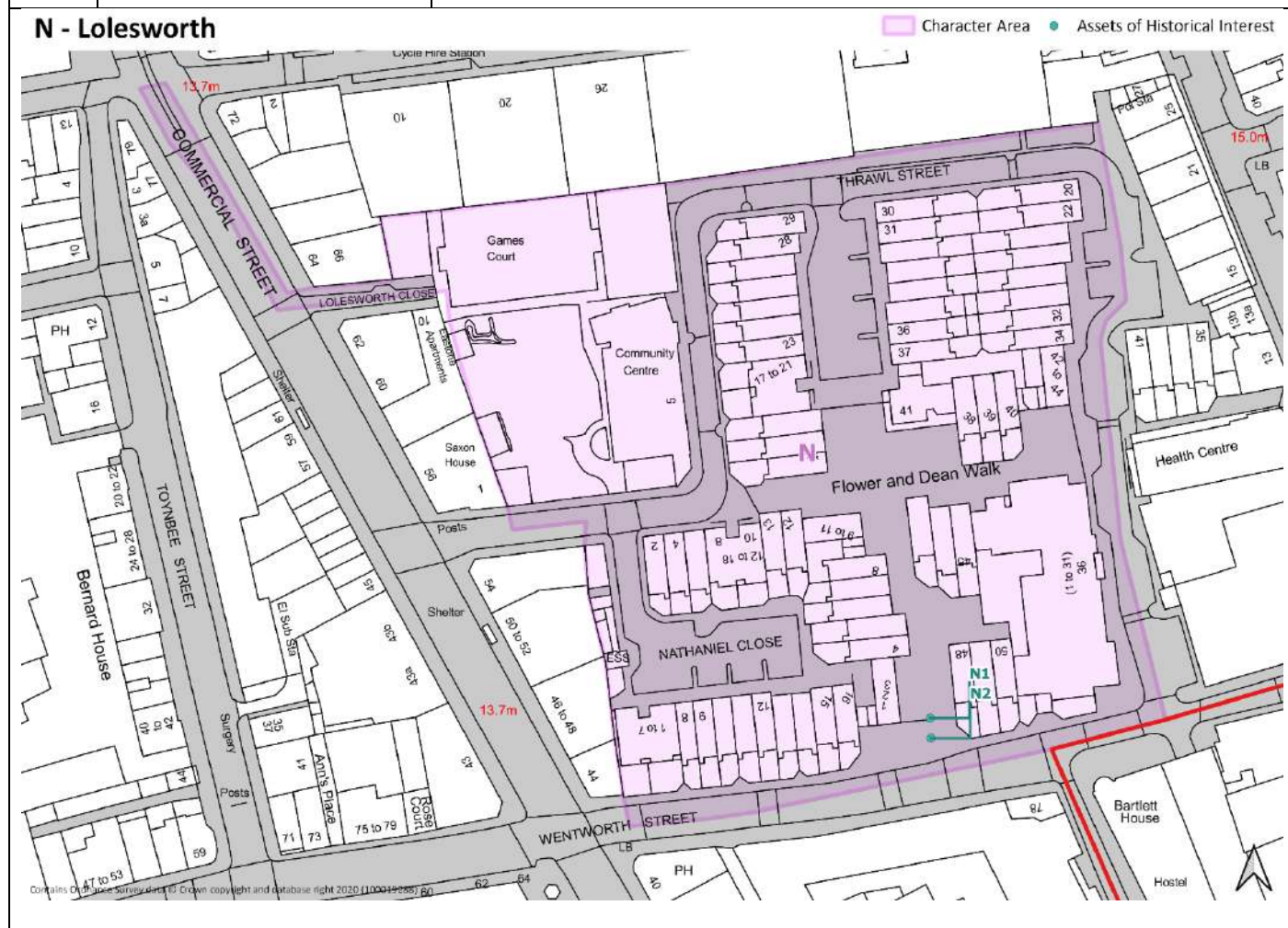
Map Ref.	Address	Description
		great aplomb, and originally more dominant still because originally five storeys high (presumably with hotel rooms at top) but reduced in height after war damage.
K30	33-59 (odd) Wentworth Street	Part of the London County Council inter-war Holland Estate, three storey plus steep clay tile roof with hipped dormers, prominent chimney stack and pots, yellow brick with red brick dressings, neo-Georgian details, multi-paned sash windows; shop fronts follow the curve of the street but central section of upper floors step back
K31	88-90 Middlesex Street	Including No.2 Strype Street, dated 1901, commercial, 5 storey, red brick with render window heads, cornice, ground floor doorcase and pilasters, shaped gables, loading bays with cranes to both Middlesex and Strype Streets, splayed corner
K33	Old Castle Street - Street sign	Side elevation of No.50 Wentworth Street, metal street sign 'OLD CASTLE ST. E
K35	7 Cobb Street	Late C19, 4 storey workshops, paired sash windows to upper floors, splayed corner to Cobb Street with high level circular window
K36	16-24, 26-28, 30-32, 34-50 Wentworth Street	1930s LCC 5 storeys with 4 floors of public house above ground floor shops. Yellow brick with red brick window surrounds and string courses, reduced neo-Georgian; Merchant House 2 storey linking range with decorative pediment
K37	1-7 Leyden Street & 7 Cobb Street	Late C19, 4 storey workshops, paired sash windows to upper floors, splayed corner to Cobb Street with high level circular window
K38	21-29 (odd) Wentworth Street	Early/mid C19, terrace of six 2 bay houses, 3 storey with high parapet, brick now painted or pebble-dashed, stucco cornice with dentils
K39	2-10 Cobb Street	Late C19, 4 storey, tenement over shop, currently under repair and hidden by scaffold May 2020
K40	Goulston Street - Street signs	Matching pair of cast-iron street signs "GOULSTON STREET E" on east and west flank walls at junction with Wentworth Street
K41	80 Middlesex Street (Osborn House)	Early C20 commercial, 5 storey, corner site with substantial return to south side of Cobb Street, red brick with render detailing, large workshop windows, metal frames, broken pediment to ground floor southern and splay corner entrance, all recently restored
K42	Leyden Street - bollard	Cast-iron bollard, square chamfered edges, at southern end of island at junction with Wentworth Street, inscribed 'WELLS & COMPANY HIGH STREET SHOREDITCH'
K43	7-19 (odd) Wentworth Street	Late C19 workshops, part of same development as Nos 1-7 Leyden Street (see above), 4 storeys, paired sash windows to upper floors, stock brick with red brick string course and render window heads, some now painted, original gables all missing except No.17, pilasters between shop fronts, splayed corner to Leyden Street with circular window, two bay return to Leyden Street
K44	74 Middlesex Street	Former public house C20, north corner with Wentworth Street, a curiosity in a street of grander and taller buildings, two storey, painted render, with shallow third storey and steep mansard on corner (for landlord accommodation), splayed corner with round-headed cartouche for name (covered over). Cast metal sign on 1st floor flank 'WENTWORTH ST.E.1'
K46	2-4 Wentworth Street	Part of Nos 62-72 Middlesex Street, see above

Map Ref.	Address	Description
K47	62-72 (even) Middlesex Street	Including Nos 2-4 Wentworth Street, late C19 tenement with shops, continuation of Nos 52-56 above, yellow brick with render window heads, string courses and cornices, some painted, splay corner with windows to Wentworth Street, flank elevation cast metal street sign 'WENTWORTH ST.'
K48	52-56 Middlesex Street	Including No.1 New Goulston Street, late C19 tenement with shops, yellow brick with render window heads, string courses and cornices, some painted, timber sash windows, splay corner with windows to New Goulston Street
K49	1 New Goulston Street	Including No.1 New Goulston Street, late C19 tenement with shops, yellow brick with render window heads, string courses and cornices, some painted, timber sash windows, splay corner with windows to New Goulston Street.
K50	50 Middlesex Street ("The Bell P.H.") **	(Once temporarily called The Market Trader), early C20 Queen Ann style, asymmetric with wider frontage and gable to New Goulston Street, yellow brick with red brick dressings, corner splay and terracotta pediment with bell relief. Pub front with green glazed tile stallriser decorative pilasters and fascia cornice.



L1	131 Commercial Street	Built as a branch of Lloyds Bank in 1935 to the design of Victor William. A very erudite and assured wedge of a building on corner with Lamb Street. Although only a 3 storey building it achieves monumentality, and commands the curve in the street, by the use of giant Doric pilasters that
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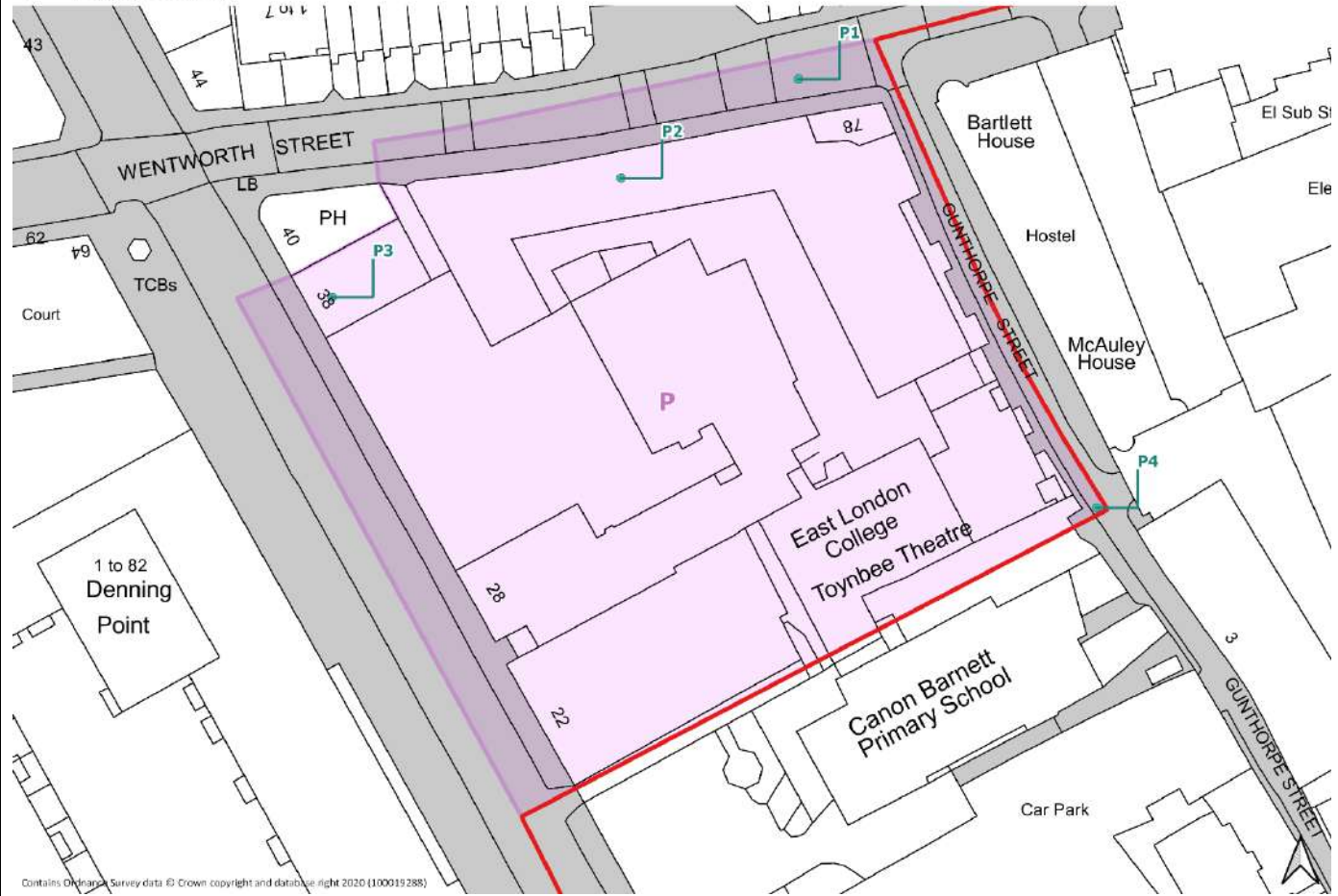
Map Ref.	Address	Description
		frame large ground floor windows that were to light the banking hall. The building is given extra gravity through the display of a very handsome pedimented stone-made doorcase on the building's blunt corner that confronts Commercial Street.
L2	1 Stothard Passage	Late C17, rebuilt C20, 3 storey, rendered frontage and entrance to Stothard Passage, red brick frontage with timber sash windows to north elevation facing Spital Yard, with plaque commemorating Susannah Wesley
L3	37- 51 Brushfield Street, north side	1929 extension to market originally for banks and offices, now converted to retail with rear elevation opening onto new mall. Group of five similar 2 storey blocks of 6, 6, 8, 6 and 3 bays wide, linked by 4 double-height archways adorned with City Corporation coat of arms, neo-Georgian style, red brick, corner stone finials, timber sash windows




N1	Flower & Dean 1886 Archway	Junction with Wentworth Street, Rothschild Arch 1886, red brick, moved and rebuilt 1980s, inscription stating 'Erected by the Four Per Cent Industrial Dwelling Company Ltd. 1886'
N2	Wentworth Street - bollard	Back edge of pavement at entrance to Flower and Dean Street, cast-iron cannon bollard, inscribed 'St GEORGE'S PAVEMENT COMMISSION 1846'. Group value with Rothschild arch. Similar to bollard in Fashion Street, made

Map Ref.	Address	Description
		for St George-in-the-East and relocated from elsewhere to Wentworth Street.

O - St. Jude		
O1	New Goulston Street - carriageway	Granite setts in carriageway, partly exposed

Map Ref.	Address	Description
<p>P - Toynbee Hall</p>  <p>Character Area Assets of Historical Interest</p> <p>WENTWORTH STREET</p> <p>GUNTHORPE STREET</p> <p>Bartlett House</p> <p>Hostel</p> <p>McAuley House</p> <p>East London College</p> <p>Toynbee Theatre</p> <p>Canon Barnett Primary School</p> <p>Car Park</p> <p>1 to 82 Denning Point</p> <p>PH</p> <p>TCBs</p> <p>87</p> <p>88</p> <p>28</p> <p>22</p> <p>3</p> <p>P1</p> <p>P2</p> <p>P3</p> <p>P4</p> <p>Contains Ordnance Survey data © Crown copyright and database right 2020 (100019288)</p>		
P1	Wentworth Street - carriageway	From 10 metres west of junction with Gunthorpe Street running east as far as Providence Row, exposed granite setts in carriageway, contiguous with Gunthorpe Street
P2	76 Wentworth Street	Late C19 commercial, red brick, 6 storey with gable, symmetric with gothic arch windows to 1st, 4th and 5th floors
P3	38 Commercial Street	Late C19 commercial 4 storey, with gable, group value with No.40, and provides framework to new space in front of Toynbee Hall
P4	Gunthorpe Street road surface (note: only west side of street is in NA)	Exposed granite setts, complete, including Broads Silent Knight manhole cover

Map Ref.	Address	Description
<p>Q - Chicksand</p>  <p>Legend: Character Area (pink), Assets of Historical Interest (blue dot)</p> <p>Map labels: SEVEN STARS YARD, SERICK LANE, HENEGATE STREET, CHICKSAND STREET, SPELMAN STREET, MONTHOPE ROAD, CASSON STREET, Spelman House, Health Centre, Sports Facility, Play Area, Talkworth Street, Chicksand House, Hostel, ET Sub Sta.</p> <p>Dimensions: 15.0m, 14.3m, 6.3m</p> <p>Copyright: Ordnance Survey data © Crown copyright and database right 2020 (100019288)</p>		
Q1	Henegate Street - carriageway	That part of carriageway in Sub-area Q, granite sett road surface (see also Sub-area F)

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Spitalfields Neighbourhood Forum



Spitalfields Neighbourhood Plan 2020-2035

Consultation Statement – draft 4

October 2020

CONTENTS

1	CONSULTATION PROCESS	2
	Introduction.....	2
	Consultation process	2
	Results of the consultation process	11
	Development of the Neighbourhood Plan policies and evidence	12
	Strategic Environmental Assessment	13
	Habitats Regulations Assessment.....	13
2	REGULATION 14 (PRE-SUBMISSION) CONSULTATION.....	14
	Summary of representations	15

APPENDIX A	CONSULTATION REPORT BY GRACECHURCH CONSULTING
APPENDIX B	WORK OF CITIZENS UK
APPENDIX C	COMMONPLACE SURVEY AND DATA
APPENDIX D	REGULATION 14 CONSULTATION REPRESENTATIONS BY LONDON BOROUGH OF TOWNER HAMLETS

1 CONSULTATION PROCESS

Introduction

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Spitalfields Neighbourhood Plan (SNP).
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:
 - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - explain how they were consulted;
 - summarise the main issues and concerns raised by the persons consulted; and
 - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the SNP are as a result of considerable interaction and consultation with the community and businesses within the Forum area. Work has involved community groups over approximately six years, as well as surveys and public events. This has been overseen and coordinated by the Spitalfields Neighbourhood Forum Steering Group, which was formed to lead the SNP. At various stages through the SNP process, professional planning consultants have been appointed to support the development of the Plan together. Views and interactions from this entire process led to the Vision and Objectives in the SNP, and subsequently therefore form the basis for the key policies set out in the SNP.

Consultation process

- 1.4 An Interim Steering Group (ISG) with purpose of establishing a neighbourhood forum was established after a joint decision in December 2013 by the Spitalfields Society (an amenity society established 1992) and the Spitalfields Community Group (established 2011) to work together on this project. It was agreed by the two groups that the creation of a neighbourhood plan would meet the aims and objectives of both the local organisations and would improve Spitalfields as a place to live and work.
- 1.5 The work to establish a neighbourhood forum and define a neighbourhood area would be coordinated by an Interim Steering Group established for that purpose.
- 1.6 In early 2014 the Interim Steering Group appointed Lorraine Hart as a consultant and began meeting together.
- 1.7 The draft Constitution was based upon other similar constitutions successfully used in other neighbourhood forums.
- 1.8 When the ISG was considering its proposal for a neighbourhood area, the first thing it did was ask Tower Hamlets Borough Council (THBC) for advice. They were advised by the Strategic Planning Department that a sensible approach would be to first determine the area which they understood

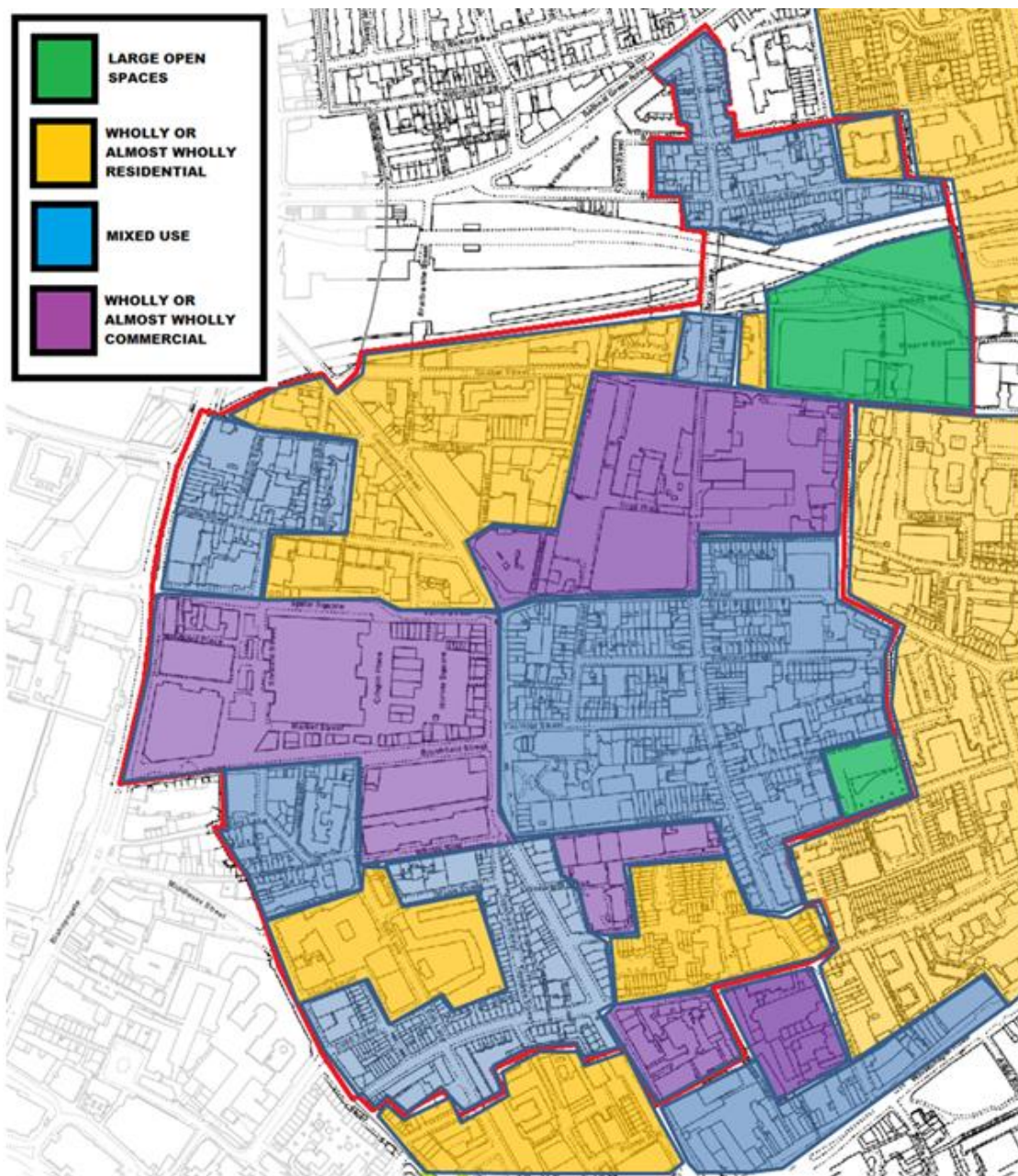
to be the 'core' of Spitalfields and after that to consider where the peripheral areas around that core might be. The contact at the planning department also agreed with the early position of the ISG that the ward boundaries covered a very large area (which at that particular time were about to be reviewed as part of a Local Government Boundary Commission review) and thus did not, and may not in the future, represent an area well-suited for neighbourhood planning purposes. The Weavers ward boundaries had not formed the basis of the neighbourhood area recently designated in East Shoreditch, for example.

- 1.9 After the ISG had identified a core area for Spitalfields that was centred on Brick Lane, the Old Truman Brewery (OTB), Christ Church, Spitalfields Market and the Jamme Masjid, it then slowly determined the peripheral area around it. This periphery was based on a study of the existing planning landscape such as the location of the various Conservation Areas, the Town Centre Hierarchy, the Cumulative Impact (Licensing) Zone and the Central Activity Zone borders. It was agreed it was sensible that the area proposed should be as compact as possible and avoid any detached parts, enclaves or confusing extensions. It was also agreed that the western boundary should extend to the edge of Tower Hamlets borough. In other places it was decided to base the boundaries on a study of the physical realities on the ground; it was agreed that this should include both sides or whole lengths of important thoroughfares as well as urban grain and land use. It was agreed that both sides of Whitechapel High Street were in Whitechapel. It was then decided that Wentworth Street, a distinctive commercial area famous for Petticoat Lane Market, should form a southern limit and that both sides of this street should be within the proposed neighbourhood area. It was agreed that the whole lengths of the Commercial Street and Brick Lane 'high streets' should fall within the neighbourhood area, where practicable, and this concept as well as the existence of the Bishopsgate Goods Yard Strategic Site and the adjacent border of the newly created East Shoreditch Neighbourhood Area informed the northern boundary. The marked contrast in the urban grain and land use on either side of the Spital Street and Spelman Street axis was so apparent in the maps, aerial photos and plans that were studied, that it was agreed that these streets would be an appropriate easterly limit to the neighbourhood. These decisions were designed to ensure the neighbourhood area remained focussed on the heart of Spitalfields with its distinctive mix of residential and commercial areas and would be an Area where future neighbourhood planning policies could be applied consistently.
- 1.10 Throughout 2014 the ISG shared these ideas and proposals about the boundaries with the Strategic Planning Department at THBC who informed the ISG that they thought the boundary proposals were good for neighbourhood plan making purposes.
- 1.11 The ISG decided to organise two public consultation meetings to invite comments on draft proposals for a constitution and the boundaries of the neighbourhood area. The first consultation event in July 2014 would be for local stakeholders and a second consultation event held a little later in August would be for the general public.
- 1.12 Using a variety of local contacts the ISG began to draft a list of local 'stakeholders' whom it would aim to consult with as early as possible regarding neighbourhood planning in Spitalfields. Particular regard was paid to ensuring it would reach ALL sections of the community, particularly hard-to-reach sectors. This list was created using the ISG's own developing knowledge as well as reaching out to groups such as the Tower Hamlets Council Volunteer Centre, Toynbee Hall and extending its contacts to a wider list of local groups involved in the public consultations on the Bishopsgate

Goods Yard development (list produced by Soundings for Ballymore/Hammerson). Via these sources it was possible to put together a list of about 75 local organisations, resident groups and notable business interests in the area which would be the 'stakeholders'. This group was not 'set in stone' but was fluid as more names were added and some which were inactive were removed.

- 1.13 In mid-2014, a leaflet was produced called *Your Spitalfields: Your Future* and delivered by hand to every residential and business address in the central Spitalfields area. This leaflet explained what neighbourhood planning was and invited recipients to attend the public consultation meeting in August to learn more about the opportunities it presented communities such as ours. At around the same time a letter was sent to each of the 75 stakeholders we had identified which invited them to a separate stakeholders meeting in July.

Analysis to help establish the Neighbourhood Area boundary, 2014



- 1.14 In July 2014 representatives of 26 local stakeholders attended a stakeholder consultation meeting at the Attlee Centre and gave detailed feedback to us about how they thought a neighbourhood plan might help meet the needs of the local area. These organisations represented tenants', community and residents' groups, key local businesses and employers, charities and trusts and heritage groups and business associations who had all responded to the letters that had been sent out.
- 1.15 In early August 2014 a second public consultation meeting was held, also at the Attlee Centre. Many local people attended this after receiving our leaflet and learnt about neighbourhood planning and gave us further helpful feedback. At this meeting it was agreed by those persons present that the neighbourhood area boundary should be extended slightly to include Spitalfields City Farm and the Chicksand Street Ghat.
- 1.16 At both these meetings the ISG began gathering members of the prospective neighbourhood forum and established three categories of membership: (a) resident member; (b) business member; (c) representatives of local non-profit organisations. Through these meetings and through the dedicated website, 90 members were signed up by the time of the inaugural meeting.
- 1.17 On 18 August 2014 the inaugural meeting of the Spitalfields Neighbourhood Planning Forum was held with 34 members in attendance. At this meeting the boundaries of the proposed neighbourhood area and the terms of the proposed constitution were debated and adopted by local people. An alternative boundary proposal that excluded the Truman Estate was considered but ultimately a version of the bounds that included that estate was agreed in a vote. The prospective neighbourhood forum was then formed and its elected committee of 12 people was tasked with submitting an application for official Forum approval and Area designation to THBC.
- 1.18 The committee that was formed at the inaugural meeting was assembled according to the Constitution and consisted of 12 members so elected for that purpose from among the general membership. There were six resident members elected, three business members elected (representing Zeloof LLP, Old Truman Brewery and Johnson Architecture & Design) and three local organisation members elected (representing SOUL, Attlee Youth & Community Centre and Friends of Mallon Gardens).
- 1.19 An application for Forum approval and Area designation was made in December 2014. During the discussions that followed between the prospective neighbourhood forum and THBC, representations were made by local business organisations who argued that the proposed neighbourhood area had substantial areas which were wholly or predominantly commercial in nature. Subsequently, the THBC Strategic Planning Department recommended that the Area designation application be revised to make it an application for a business neighbourhood area. THBC also recommended some physical changes to the boundary so that it included the whole of the Holland Estate. These recommendations were supported.
- 1.20 The revised Business Neighbourhood Area designation application and the Neighbourhood Forum application were both eventually approved (with some minor boundary changes) by THBC in a designation and approval statement made in April 2016 which established the Spitalfields Neighbourhood Area as a business neighbourhood area and approved the Spitalfields Neighbourhood Planning Forum as the neighbourhood forum for the Spitalfields Neighbourhood Area.

- 1.21 During 2015 and 2016 the committee (called the 'Forum Council') considered different ways of understanding local planning policies and consulting local people on them. A 'consultation framework' was agreed that would be used by variously themed policy working groups so they operated within common parameters. The working groups would research and understand the existing planning policy in particular areas of interest and then reach out to the local community to get their input on particular problems and opportunities in that policy area.

Meeting of Spitalfields Forum Council, 2017



- 1.22 In 2017 the Forum appointed Tony Burton as a consultant to help refine the processes that the Forum had already begun to develop. It was agreed to continue the established policy of diversified consultation by having separate and bespoke consultation methods with one type aimed at 'local stakeholder consultations' (primarily local businesses and other organisations with an interest in Spitalfields) and another type aimed at the general public, local residents and workers.
- 1.23 To advance the first type, a list of about 40 local stakeholders was drawn up and letters were sent to them inviting them to take part in our consultations about the needs and opportunities in Spitalfields. Around half of these stakeholders agreed to engage with the Forum.
- 1.24 Participants in the stakeholder consultation exercise included the Cabinet member for Strategic Development at THBC, representatives of the owners of Old Spitalfields Market, the director of the East End Trades Guild, representatives of the owners of the Old Truman Brewery estate, the author of Spitalfields Life (a local, online publication), representatives of Spitalfields Housing Association and East End Homes, Spitalfields Community Group, the Spitalfields Society, Spitalfields Historic Buildings Trust, the Friends of Christ Church Spitalfields, the Rector of Christ Church Spitalfields, the chairman of the Banglatown Restaurants' Association, the organiser of the Bengali East End Heritage Society, representatives of British Land and Spitalfields City Farm.

- 1.25 These consultations consisted of face-to-face interviews asking a set of questions common to each interview. The interview lasted about an hour and were recorded and later codified so the themes and priorities could be drawn out in such a way as to be made quantifiable. The interviews took place during 2017 and 2018 and the analysis of the data derived from these interviews was made by Gracechurch Consulting (which is a full member of the Market Research Society) in September 2018. This full report by Gracechurch Consulting as well as a full list of respondents can be seen in Appendix A. When the extent of this research began to be evaluated and the range of contributions by local businesses was evaluated by our consultant Tony Burton he said the efforts we had made to ensure businesses were included in our plan making process were “among the best he had seen”.

Activity at the Spitalfields Forum AGM, October 2017



- 1.26 In March 2017, Commonplace was appointed to facilitate the Forum’s general public consultation. The Commonplace survey platform has been used by many neighbourhood plan making bodies to record public opinion about particular places in their neighbourhood area. This survey recorded how people felt about those particular places or issues and provided an opportunity for them to recommend improvements. To encourage participation, three walkabout tours took place where members of the public joined Forum committee members to visit parts of Spitalfields and record their views on the Commonplace platform. Public awareness of this consultation was made by a leaflet delivery and through a public meeting where the survey platform was launched and explained. Local newspapers reported on this meeting which further spread the word.
- 1.27 In September 2017 the Forum determined that it had to ramp up its efforts to seek the views of harder-to-reach communities, in particular the British-Bengali community. It engaged with the East London Citizens Organisations (TELCO) which is part of the civic organisation Citizens UK (CUK) to

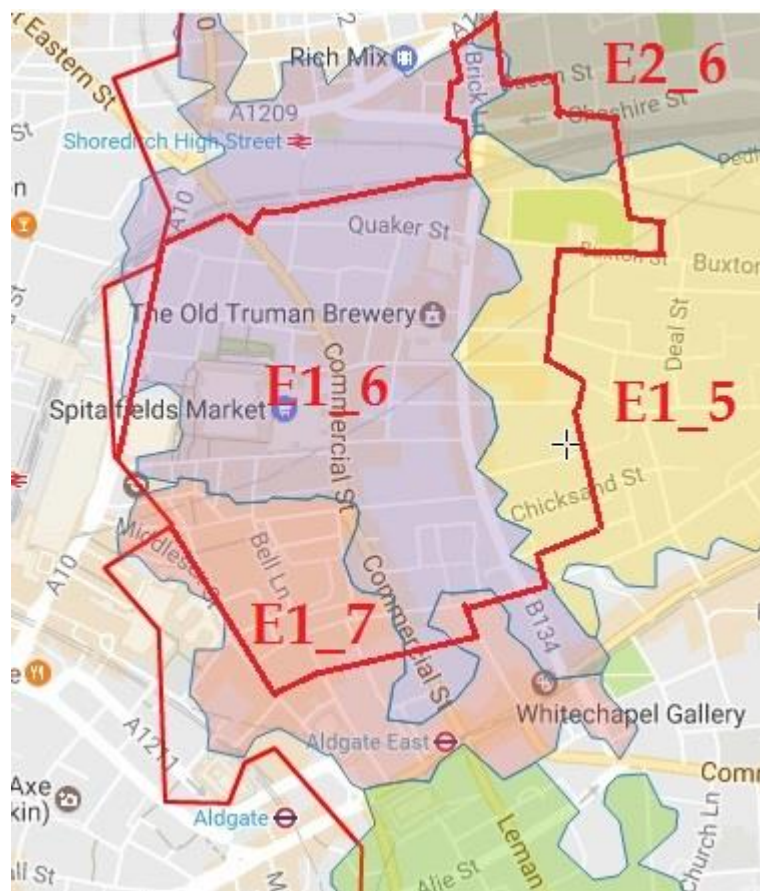
facilitate this. Their services were commissioned to use paper versions of the Commonplace survey form and approach the communities the Forum had hitherto struggled to get a representative level of engagement from. TELCO recruited students from the Geography Department at Queen Mary University to help them gather the data required.

Advert in Janomot (a Bengali newsweekly) in 2017

The image shows a collage of elements from a Bengali newspaper advertisement for Spitalfields Forum. At the top, there's a newspaper masthead for 'জনমত' (Janomot) dated 28 July - 03 August 2017. Below it are several headlines and photos. One headline reads 'ছুরি হামলা বাড়ছে যে কারণে' (Stabbing attacks are increasing due to these reasons) with a photo of a crime scene. Another headline reads 'নেতৃত্ব নিয়ে সংকটে থেরেসা মে!' (Theresa May in a crisis over leadership) with a photo of Theresa May. To the right, there's a photo of a woman. Below these are two columns of Bengali text. At the bottom left, there's a section titled 'এক সপ্তাহে উদ্ধার করা ছুরির ছবি প্রকাশ' (Publication of knife photos recovered in a week) with a photo of various knives. At the bottom right, there's a large advertisement for 'Spitalfields Forum' featuring a map of the area and Bengali text: 'পাবলিক কনসালটেশন' (Public Consultation), 'প্টিশাল্ফিল্ডস এর অফিসিয়াল পাবলিক কনসালটেশনে অংশ নিন।' (Participate in the official public consultation of Spitalfields), and 'কনসালটেশনে অংশ নিন' (Participate in the consultation). The website 'spitalfieldsforum.org.uk' is also mentioned.

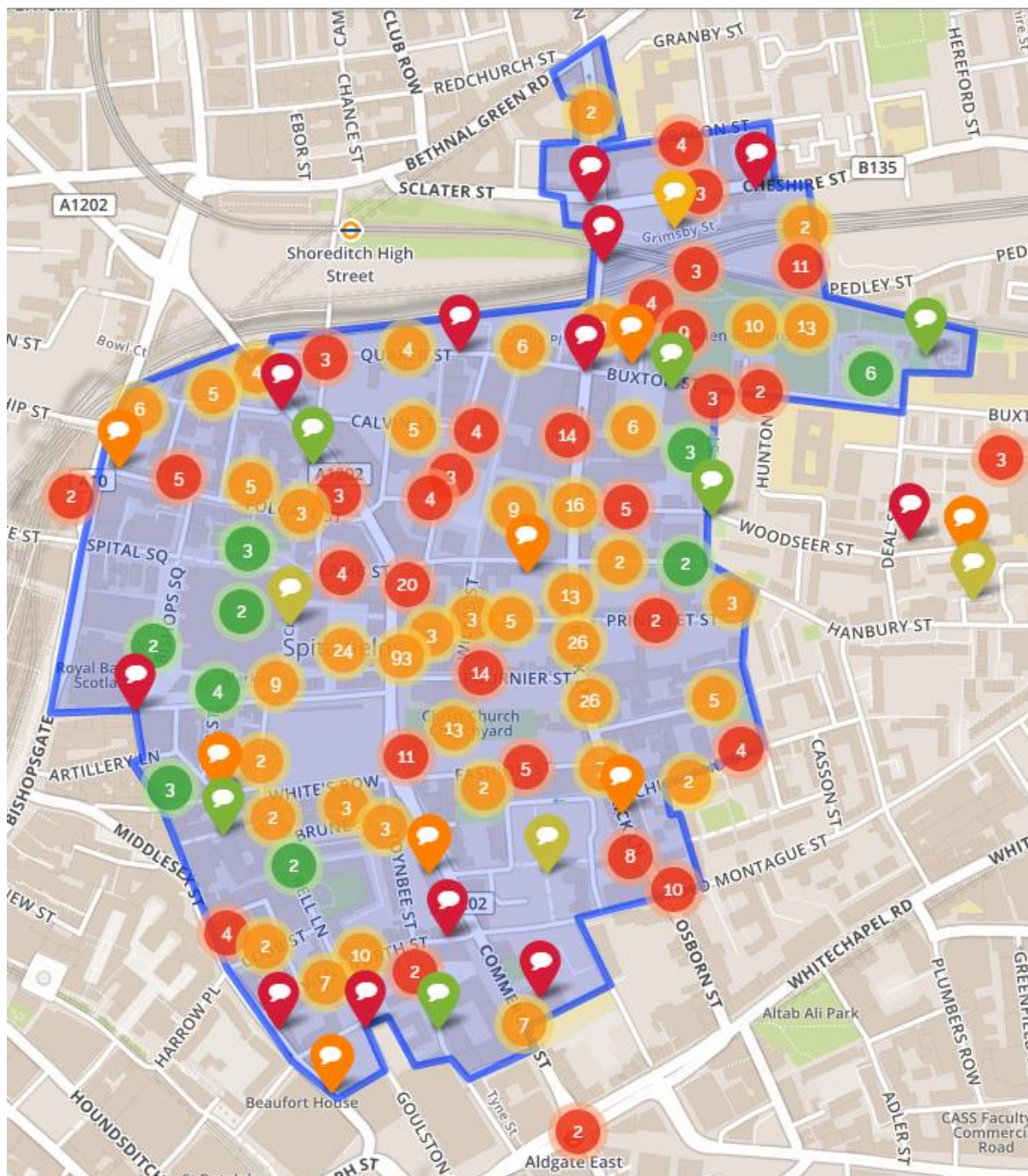
1.28 The Forum also tried its best to ensure local people knew about the work of the Forum by running a half-page Bengali-language advert in Janomot newspaper for three weeks in September 2017 and commissioning Royal Mail to do a door-to-door bulk delivery of a bilingual leaflet which was delivered to 5,266 household and business addresses in the E1-6 and E1-7 'postal sectors' in August 2017 (See Figure 1). The parts of the neighbourhood in other postal sectors were delivered by hand.

Postal sectors that the bilingual leaflet was delivered to, 2017



- 1.29 TELCO collected 231 surveys from members of the public at various locations determined by them as suitable for collecting the opinions of the hard-to-reach communities from whom more feedback was needed. They set up stalls and helped people fill in paper-based survey forms asking the same questions as the online Commonplace survey both at the Brick Lane Mosque and the East London Mosque. TELCO also engaged with the Brick Lane Trust, the Mariam Centre, Spitalfields Small Business Association, the Osmani Trust, Canon Barnett School and Christ Church Primary School and arranged for surveys to be emailed out to participants, resident groups and parents. The survey to resident liaison groups associated with Spitalfields Housing Association as well as the Brick Lane Trust included a £5 voucher to incentivise participation. The small local Sikh community also assisted by taking some paper survey forms to a community centre. Further details about the work of Citizens UK to assist the Forum can be seen in Appendix B.
- 1.30 In March 2018 this period of general public consultation came to an end. 1,809 separate people had visited the survey site in total. 664 people had read the site in depth but did not comment. 402 individuals had interacted in some way with the site by commenting or agreeing with other people's comments. These 402 people had made separate 602 comments and 1,492 agreements with other people's comments.

Map showing location and number of comments to 2018 consultation



- 1.31 In addition to these 402 people who actively took part in the Commonplace survey online, 231 people who had completed a paper survey were contacted directly by Citizens UK/TELCO and asked to indicate their views on places in Spitalfields.
- 1.32 The engagement that took place online and on paper can be understood in terms of the type of people who got involved. Of the total of 633 participants, 32% said they lived in the neighbourhood area, 30% said they worked there, 29% were visitors to the area and 9% indicated they were students.

- 1.33 The participants also indicated that 59% were female, 37% were male and 4% either did not record their gender or said they were another category.
- 1.34 In terms of ethnicity, respondents closely matched national statistics data for the Forum area. The largest group of contributors declared they were white (39%), with a slightly smaller proportion saying they were British-Bengali/Bangladeshi (37%). In addition, a further 7% said they were “other Asian”, 9% said they identified as black, 4% were mixed race and 4% did not declare an ethnicity.
- 1.35 National Statistics data from the Census of 2011 indicates that a total of 43% of the larger Spitalfields & Banglatown Ward identify as either ‘White British’ or ‘White Other’. 41% of the same ward identify as ‘Bangladeshi/Bengali’. 5% identify as black and 9% in the other categories. So it can be said that the profile of the people responding to the Forum survey very closely corresponds to the profile indicated by national statistics and the public consultation exercise using Commonplace (online and on paper) can be said to be very representative of the people who live in the area. Further information about the Commonplace survey and the data can be seen in Appendix C.

Results of the consultation process

- 1.36 After the end of our consultation period in March 2018, the Forum spent the six months or so analysing all the data it had received. It was possible to pick out the positive and negative comments from the online survey.
- 1.37 The top negative comments were from people who said the neighbourhood or parts of it were (or were felt by them to be) dirty, dangerous, unwelcoming or poorly maintained.
- 1.38 The top positive comments about the neighbourhood said it, or parts of it, were historic, welcoming, attractive, a good place to visit to go out, eat or shop, a good place to live and a good place to work.
- 1.39 The top recommended improvements were about reducing antisocial behaviour, traffic calming measures and improving street cleaning and rubbish collecting. The Forum felt that these things were not matters a neighbourhood plan could directly address through policy – it is not possible to control when bins are emptied, to reorganise traffic directions or speed restrictions, monitor CCTV or direct police resources. The Forum was also mindful of the emerging Tower Hamlets Local Plan which would be making some changes in these areas, the bringing ‘in house’ of public refuse collections by THBC and the Liveable Streets project also led by THBC designed to improve the streets, reduce anti-social behaviour and calm traffic. However, the Forum still considered it important to make representations to higher authorities about these matters in its role as representing the interests of local people.
- 1.40 Moving down the list, the next most recommended improvements were areas where the forum thought it could make a real difference. They were chiefly concerning improving roads and pavements, protecting heritage and improving open space.
- 1.41 The Forum blended into this process the data from the in-depth stakeholder consultations and this further reinforced the importance of some of these areas of improvement, particularly regarding the heritage of the area. Numerous stakeholders also raised the growing concerns of small and micro local businesses concerning increasingly high rents and the costs of doing business.

- 1.42 All of this material was distilled through a process of identifying key words and giving them relevant weight and priority according to the frequency and intensity they were raised in the two forms of consultation. This process resulted in the drafting of a 'Vision for Spitalfields' in late 2018. The vision was further refined and during 2019 three core and 'achievable' objectives were developed which we felt most closely represented the sum of data we had received.
- 1.43 These three objectives were:
- to improve the environment by providing as much greenery as possible in this deeply urban area;
 - to protect and enhance the historic built environment; and
 - to maintain the special and diverse business mix that has settled in the area whilst maximising the employment opportunities that result from the neighbourhood's prime location and to support the small scale creative and artisan businesses that have always been part of the Spitalfields story.

Development of the Neighbourhood Plan policies and evidence

- 1.44 Throughout the rest of 2019, three 'policy working groups' were established to research ways the Forum could achieve those core objectives. The policy working groups (business mix, urban heritage and green spaces) looked more closely at the data and in particular a report the Forum had commissioned which analysed the survey data geographically to identify areas of most interest or concern. The working groups also reached out to expert organisations such as the Spitalfields Historic Buildings Trust, key local business stakeholders and the East End Trades Guild to gather additional evidence to support and justify particular policies that were designed to achieve the core objectives, realise the Vision for Spitalfields and meet the unique needs of Spitalfields in the 21st century.
- 1.45 In late 2019, the Forum Council engaged with Navigus Planning for their assistance and guidance in drafting a neighbourhood plan document. The Forum was aware that Navigus were involved in supporting another neighbourhood forum elsewhere in Tower Hamlets and therefore considered choosing Navigus a sensible option as they would be familiar with the borough and THBC officers.
- 1.46 The policy working groups then worked closely with Navigus Planning during early 2020 to determine how the objectives would be delivered through planning policy. Separate meetings were held between members of the Forum Council representing business, resident and local organisation interests in all the key objective areas until the policies for environment, business mix and urban heritage were agreed.
- 1.47 Further expert advice was brought in to assist the heritage working group. Dan Cruickshank and Alec Forshaw undertook a detailed survey of the neighbourhood area to support our urban heritage policies.
- 1.48 Expert advice was also sought by the environment/green working group. The biodiversity officer at THBC contributed his views on a range of biodiversity initiatives being considered. The Liveable Streets team were approached for their input. Other local groups such as Spitalfields Open Space and the Attlee Youth & Community Centre were asked for their help in providing further

justification for the inclusion of Christ Church Gardens and the Chicksand Street Ghat (respectively) as Local Green Spaces.

- 1.49 The East End Trades Guild shared its own research with the Forum Council to support the policies designed to support our business mix. The East End Trades Guild through its representatives, justified, wrote and agreed the wording of the business mix policies in dialogue with other sectors of the community represented on the Forum Council.
- 1.50 At a Forum Council meeting on 12 June 2020 all the policies in the pre-submission draft plan were agreed and the document was shared with officers in the Strategic Planning Department at THBC for their informal comments and feedback.
- 1.51 The draft Spitalfields Neighbourhood Plan was amended following feedback from THBC and the final version of the draft document was recommended to the members of the Forum who voted to recommend it proceed to Regulation 14 Consultation on 15 July 2020.

Strategic Environmental Assessment

- 1.52 In June 2020, when the draft SNP was submitted to THBC for informal comment, a request was made for a screening opinion on the need for a Strategic Environmental Assessment (SEA). Following amendments made to the Plan ready for Regulation 14 Consultation, the screening assessment was undertaken by THBC who consulted the appropriate statutory bodies (Environment Agency, Natural England and Historic England). In light of this, the assessment concluded that the draft SNP was not likely to have a significant impact on the environment, therefore an SEA was not needed. The Screening Report by THBC is included as part of the supporting evidence base to the Plan.
- 1.53 Following Regulation 14 Consultation, minor amendments were made to the Plan. No new policies were added and there were no material changes to policies such that this would change the overall outcome of the screening opinion.

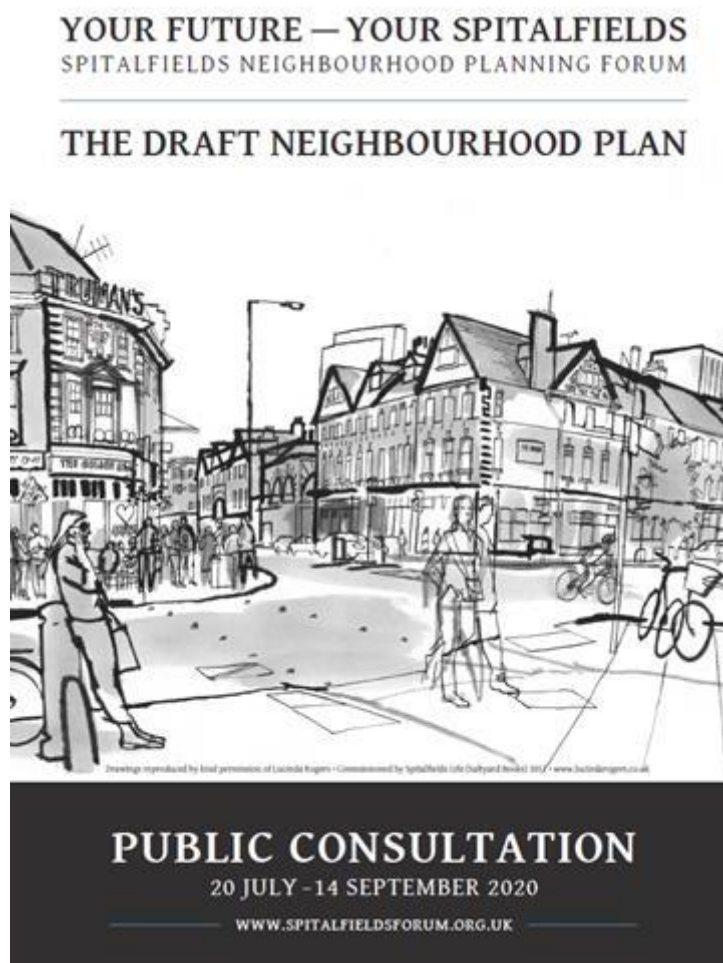
Habitats Regulations Assessment

- 1.54 At the same time as the SEA screening was requested and subsequently undertaken, the same screening process was carried out on the need for a Habitats Regulations Assessment (HRA). This was undertaken by THBC who consulted the appropriate statutory body (Natural England). In light of this, the assessment concluded that the draft SNP was not likely to have a significant impact on European protected species or sites, therefore an HRA was not needed. The Screening Report by THBC is included as part of the supporting evidence base to the Plan.

2 REGULATION 14 (PRE-SUBMISSION) CONSULTATION

- 2.1 Regulation 14 (Pre-Submission) Consultation was undertaken between 20th July and 14th September 2020. Leaflets publicising the consultation and summarising the key issues were hand-delivered to every address in the Neighbourhood Area. This information and the plan document were also presented on the Spitalfields Neighbourhood Forum website.

Publicity leaflet advertising the Neighbourhood Plan Pre-Submission Consultation



- 2.2 A separate survey was conducted using Survey Monkey focussing on some specific public realm improvement proposals. This was sent out using local resident group email lists. The intention was to confirm or otherwise the public realm items in the proposed CIL spending list.
- 2.3 The statutory bodies were informed of the consultation either by email or letter. The list of statutory bodies was as follows:
- London Borough of Tower Hamlets
 - Mayor of London
 - City of London
 - London Borough of Hackney

- Coal Authority
- Ministry of Housing, Communities and Local Government
- Natural England
- Environment Agency
- Historic England
- Network Rail
- Transport for London
- Marine Management Organisation
- NHS
- Central London Clinical Commissioning Group
- National Grid
- UK Power Networks
- Thames Water
- Metropolitan Police
- Local ward councillors for wards covered by the Neighbourhood Area and surrounding wards

2.4 In addition, a range of other bodies were written to. These included the emergency services, the Canal and River Trust, the British Bangladeshi Chamber of Commerce, the Society for the Preservation of Ancient Buildings, the East End Trades Guild, the Spitalfields Parochial Church Council and the Spitalfields Society. A host of local business and major landowners were written to, including the Truman Brewery, Old Spitalfields Market and British Land.

2.5 Each of the owners of sites or buildings proposed as Non-Designated Heritage Assets was written to at the address in question. All of the owners of the Local Green Spaces were also written to.

Summary of representations

2.6 In total, representations were received from 38 residents, 3 businesses, 13 local stakeholder bodies and 9 statutory consultees. In addition, 38 residents took part in the public realm survey.

2.7 The representations from statutory consultees can be summarised as follows:

1. City of London Corporation - did not oppose and made recommendations.
2. Greater London Authority - support with recommendations.
3. Historic England - support with detailed recommendations on heritage policies, recommended re-wording of certain sections and advice about archaeology.
4. London Borough of Tower Hamlets - general support, however SPITAL6 not supported, other areas of recommendations. More evidence wanted for some Local Green Space designations. A more detailed summary of responses to each of LBTH's comments is shown in Appendix D to this Consultation Statement.

5. Marine Management Organisation - not applicable.
6. National Grid - no comment that materially affected the Plan.
7. Natural England – no comment.
8. Sport England - no comment that materially affected the Plan.
9. Transport for London - no comment that materially affected the Plan. Considered that Plan should say more about cycling.
10. Metropolitan Police Authority - do not oppose but considered that Plan should have policies to design out crime.

2.8 The representations from local stakeholders and property owners can be summarised as follows:

1. Attlee Youth & Community Centre - support SPITAL5 but wanted land they use to be designated as local green space.
2. East End Garden Society - support for SPITAL4, SPITAL5 and SPITAL6.
3. East End Trades Guild - support SPITAL7 but think this policy should go much further
4. Holland Estate Management Board - support for NDHA status for their buildings but recommended that Wheler House be added.
5. Huguenots of Spitalfields – support.
6. Owner of 46 Cheshire Street - oppose NDHA for their building but no specific justification provided.
7. Spitalfields Community Group – support.
8. Spitalfields Historic Buildings Trust - support but wanted SPITAL1 to be more restrictive, emphasised graffiti as a growing problem.
9. Spitalfields Open Space - support for green policies.
10. Spitalfields Small Business Association - support for SPITAL7.
11. Spitalfields Society - support with some minor recommendations, additions to NDHA list proposals, question utility of one sub clause on heritage appraisals.
12. St. George's Residents Association - support Elder Gardens being given Local Green Space protection but noted complexity of management arrangements.
13. Swadinhata Trust – neutral, noted NDHA status for two Bengali heritage items but wanted more, provided detailed proposals for changes to traffic/roads in the area
14. Zeloof LLP - support but wanted one property removed from NDHA list, question use Appendix D and think SPITAL7 is too ambitious.

2.9 Three businesses made representations - one gave general support, a second praised SPITAL1 and the third recommended more pedestrianisation and improved waste management arrangements.

2.10 Of the 38 residents who responded, 35 lived in the neighbourhood area and 3 lived outside the area. All 35 residents who lived in the area supported the plan. 12 gave unqualified support and said they supported all the policies as they were. The remainder indicated their general support for

all policies but made particular recommendations about how the plan may be improved further in specific areas. Of the 3 residents who lived outside the area, all commented on the Neighbourhood Plan boundary - 2 said nothing about the plan but thought the boundaries should be adjusted in a small particular way to accommodate them, and one cited the boundaries as their reason for objection. This was the only declared objection to the plan made by any of the 63 respondents.

2.11 Of the issues raised a small number were significant enough to represent changes worthy of note:

- The relationship between SPITAL1 and Appendices A, B and D was unclear. Specifically, the status of the Character Area Appraisals (Appendix A) and the Non-Designated Heritage Assets (Appendix B) was not clear. This is important, given that both are referenced in SPITAL1. This was resolved by an explanatory paragraph being included in Section 1. This also clarified that the Assets of Historical Interest (Appendix D) were not specifically policy matters.
- Responses were not received from all the owners of the Local Green Spaces. In particular, the City of London Corporation, as owner of Elder Gardens, did not respond to the Regulation 14 consultation. They were chased after the consultation had closed and provided a response which confirmed their support for the Local Green Space designation.
- LBTH's objection to the wording of SPITAL6 was accepted and this was greatly simplified to address their concerns.

2.12 There was a sole objection to SPITAL7 by Zeloof LLP. This objection was to the requirement for a minimum 45% reduction in rents below the indicative market rate. Their proposal was that the figure should be amended to 35%. This was supported by a viability assessment. The Forum does not consider that the viability assessment is sufficient evidence to justify lowering the rate for the following reasons:

- The appraisal does not take proper account of the likely type of development in what is a very small area. Development that meets the needs of the market is unlikely to be solely office development, rather it will provide a wider range of more flexible workspaces.
- The assumptions used to inform the appraisal are not considered to be reasonable for the following reasons:
 - A rent-free/letting void of 2 years assumes full market rents are paid. By providing lettings at affordable rates, such voids are likely to be much lower.
 - Community Infrastructure Levy rates have been applied but there is no evidence about the assumed payments for each development typology. In Spitalfields, most developments will be refurbishments of existing buildings therefore the net addition of floorspace (and CIL charge) will be much lower than on a cleared site.
 - Finance at 7% is very high based on the long term trends for the cost of borrowing.
- The appraisal, based on the inputs presented, shows that the requirements of Local Plan Policy D.EMP2 are not viable. This policy requires a 10% discount on the indicative market rate. However, this policy is in an adopted plan which has been declared sound. This highlights how, at any given time in any given location, it can be shown that certain types of development may not be viable. Given the assumptions used, it is unsurprising that the appraisal will show development to be unviable. However, this is not considered to be sufficient to justify an

amendment to the discount rate. To reflect the subjective nature of such appraisals and general uncertainty that occurs over the lifetime of a plan, the policy states that the requirement is subject to viability appraisal, therefore it builds in the necessary flexibility.

- It is not clear why, if even a 10% discount rate is unviable, that the objector would be willing for the policy to require a 35% discount.

APPENDIX A CONSULTATION REPORT BY GRACECHURCH CONSULTING

Provided under separate cover

APPENDIX B WORK OF CITIZENS UK

CITIZENS UK Report for Spitalfields Neighbourhood Planning Forum

Notes of verbal report given at meeting of 5th March 2018

1. Staffing Issue and Resolution

Following the intervention from Emmanuel Gotoro to clarify the project with *Queen Mary University London* (QMUL), it became clear that the geography students had not received the survey form and therefore did not initially have the parameters for the survey. Students had met with Yasmin Akter, through our work with Tower Hamlets Citizens. Yasmin had given them training on community organising through the geography department which is something that is done at the beginning of every academic year. As the organiser for Tower Hamlets, Yasmin works with QMUL Geography lecturers, Stephen Taylor and Regan Koch. Hence the issue with the students not receiving the survey was quickly resolved through QMUL Geography who passed the link on to the students.

Emmanuel explained that the initial lack of communication in Yasmin's absence was due to the fact that her Out of Office may not have been set for people outside the organisation. However, once resolved, Emmanuel has been the main point of contact for SNPF and QMUL.

Afsana and Emmanuel then met with Toby to go through the project again and agreed a timeline and draft contract. Toby explained clearly that our remit was to target Bengalis/Asians as this demographic was largely missing from the survey. Emmanuel and Afsana contacted Stephen Taylor and were linked with 3 groups of students to do the surveys. We arranged two trips to East London Mosque to focus on the target demographic.

2. Intervention

Understanding the remit of our involvement to be specifically Asian/Bengali, and, in addition to the surveys conducted by students, Emmanuel and Afsana and other CUK colleagues engaged with the following organisations:

1. Brick Lane Trust (spoke to Chairman, emailed surveys offering £5 vouchers)
2. Brick Lane Mosque (set up tables before/after Friday prayer for people to fill in surveys)
3. East London Mosque (set up tables before/after Friday prayer for people to fill in surveys + announcement inside mosque)
4. Mariam centre (Sister Circle)
5. ELATT Connected Learning (ESOL class)
6. Spitalfields Housing Association (emailed surveys offering £5 vouchers)
7. Spitalfields Small Business Association (spoke to Chairman and emailed surveys + link)
8. Christ Church School – (Paid visit to school & left paper surveys at reception)
9. Brick Lane Businesses – Jewish Wholesaler (2 surveys completed)
10. Osmani Trust (visited the Centre and sent link to survey as requested by them)
11. Canon Barnet School (Got in touch via Parent liaison officer)
12. Channel S (contacted Bengali TV station, awaiting response)

We also translated some of the text to Bangla and distributed posters to the organisations along with an English version. The Bangla text was sent to Toby in order that it go on the SNPF website (this is before we were put in touch with James)

3. Progress

Progress was frustrating slow in the beginning of November when we first picked this up and towards the beginning of December when students had coursework deadlines.

That said, we were able to conduct and upload surveys to the Commonplaces site when we received information previously supplied to Yasmin. We think we are half-way to the target of 300 surveys agreed, but we can't assess how much traffic we sent via the online surveys.

4. Request for extension

Considering the slow start to the new year, we requested an extension to the February half-term. We hoped that this would enable us to meet the target of 300.

5. Online vs. Paper – Observations

While doing the paper survey takes twice the time, we've found this to be a more reliable way to get good responses as people don't always do this even when they promise to go online later. It seems like less people in the target community do things online and potentially prefer the face to face interaction. However, we recognise that face to face interaction also has its drawbacks as we are tagging this on to already busy activities within the life of institutions such as mosques, schools and housing associations

In addition, when we spoke to Bengali people, including professionals, who live in the area, and have done so for years, it was apparent that they didn't know anything about the development.

6. Survey Questions

As we've mostly used the paper survey, there have been many comments about the lack of information about the survey on the form itself. People were expecting to see an introductory paragraph about the survey especially about how their responses will be used. Without it, people didn't find the map that useful, confusing even.

As we've taken information from the paper survey to upload onto the Commonplace website, we've found there to be conflicting responses to some of the questions, for example one might indicate in Question 3. that they are Positive (5) about the issue they are commenting on, but then go on to give reasons why in Question 4. And respond that that it is 'dirty', 'overcrowded,' etc. when we've asked.

7. Summary

We have completed 240/300 surveys (still to upload 28).

We engaged with 11 organisations and did door-knocking on 3 estates.

Our learning from the survey is that door-knocking was more successful than other forms of engagement in terms of quality of information gathered and return for time spent. For example, the door-knock on the Shah-Jalal estate engaged with 30 of the 32 households there over a 3-hour

period. The conversations were of good quality and informative for the survey. However, door-knocking was hampered on larger estates mainly due to resistance to cold-calling, language barriers, and adverse weather conditions.

Mass engagement through TELCO member organisations such as ELATT, London Muslim Centre and other organisations such as Spitalfields Housing Association reached more people but due to the nature of the engagement, some of the conversations felt rushed, and the quality could have been better for the survey.

We also found that many people in the Bengali community were hearing about the survey for the first time and were not informed about it prior to engagement.

The sector that contributed least to our surveys was the business community though we engaged with SSBA for example.

The input of Queen Mary students was not utilised as well as it could have been due to the slippage of time and staff issues at CitizensUK. However, when the students did participate, they were brilliant in their interactions with different groups of people.

8. Membership of Tower Hamlets Citizens

In addition to the surveys we are pleased to welcome *Spitalfields Neighbourhood Planning Forum* to membership of Tower Hamlets Citizens. We are 20+ organisations in Tower Hamlets, part of TELCO – 85 organisations across 5 East London boroughs.

We work together for the common good on issues which matter to our members such as – Living Wage; Affordable Housing; Living Rent; Refugees; Good jobs for local people.

We see the survey as the start of a longer-term relationship with SNPF. What happens after the survey also matters to many of our members, and we hope that we can work together on implementing some of the ideas coming from the surveys and wider project.

All our members benefit from being in relationship with each other in a broad-based alliance; we offer training and leadership development for change. We strongly believe that to change anything you need power. Our power lies in people and the institutions they are from – churches, mosques, schools, housing associations etc. SNPF is a unique institution in THCitizens and we are proud to welcome you into membership

As a member of the Tower Hamlets Citizens Leadership Group (Phil), I'm pleased to invite you to the Delegates Assembly on March 20th so you can meet the other organisation in your borough.

Phil Warburton (Tower Hamlets Citizens Leadership Group)
Emmanuel Gotora (TELCO Lead Organiser)

APPENDIX C COMMONPLACE SURVEY AND DATA

Provided under separate cover

APPENDIX D REGULATION 14 CONSULTATION REPRESENTATIONS BY LONDON BOROUGH OF TOWER HAMLETS

Representation	Response by Neighbourhood Forum	Amendment to Plan
4. The exception to this is that the consultation draft has placed the policies after all their supporting text – it would be more conventional to include a brief contextual introduction before the policies, and then place the supporting text that justifies and explains the operation of the policy after the policy text itself.	Plans present this either way, i.e. justification then policy or vice versa. There is no material difference.	None
6. The status of the appendices needs to be made very clear, and it may be useful to include a clarifying paragraph in the introduction, and even to consider different terminology for different appendices	Agreed	Clarifying paragraph added to Introduction.
7. In this neighbourhood plan there seems to be two appendices that are intended to act as part of planning policy, and two that are meant to act as additional evidence. To avoid confusion, it may therefore be useful to move Appendices C and D to a separate 'evidence base' document when the plan is submitted for Regulation 16 consultation.	If clarity is provided in the Introduction, this the removal of certain appendices is unnecessary.	Clarification provided in Section 1.
9. It would be useful if a similar level of clarity could be provided on Appendix A – for example, there are statements in the appendix regarding the need for protection or preservation of certain character elements of the area. If there is also intended to be a presumption in favour of preserving these elements, this could be set out more clearly – at the moment, the appendix seems to sit uncertainly between description and policy guidance.	The Local Character Area Assessments in Appendix A are different to NDHAs in that they provide guidance on how to interpret the local character of the area when designing new development. In this regard they provide guidance that needs to be taken into account by the applicant. SPITAL1 is clear as to how that should be interpreted. It may be helpful to signpost that the LCAAs are provided in Appendix A – this could be done by way of a footnote to clause D.	Add a footnote to clause D of SPITAL1 to make clear that the LCAAs are in Appendix A.

Representation	Response by Neighbourhood Forum	Amendment to Plan
<p>10. Clauses B and I in SPITAL1 also reference the policies map – however, the policies map does not actually show the character areas or the heritage assets, as stated in the policy.</p>	<p>Noted</p>	<p>Amend SPITAL1 to refer to Figure 4.1 and the maps in Appendix B, rather than the Policies Map.</p>
<p>11. Paragraph 4.16 still poses some concerns. The paragraph rightly identifies that development outside the neighbourhood area could impact on the setting of heritage assets within the neighbourhood area, but then seems to imply that policies in the neighbourhood plan could therefore be applied to development outside the neighbourhood area boundary. This is not the case – the neighbourhood plan can only set policy within its neighbourhood area boundary. However, it seems that the character area guidance from Appendix A would be a relevant consideration when deciding whether a development adjacent to the neighbourhood area affects the setting of any identified heritage asset that falls within that character area. We suggest a re-write of this paragraph along the following lines: 'The Local Plan and the NPPF recognise the importance of the setting of heritage assets, and the character area guidance included in Appendix A provides important context for understanding the setting of heritage assets within the neighbourhood area. When decisions are made on proposals located outside the neighbourhood area, but which are identified as potentially impacting the setting of heritage assets within the neighbourhood area, the character area guidance should be a relevant consideration in understanding the setting of the heritage asset.'</p>	<p>Noted and agreed</p>	<p>Para 4.16 to be amended as suggested</p>
<p>12. On paragraph 4.27, the Community Safety team have noted that a balance needs to be struck between the effects that metal shutters have on the character of the area, and the</p>	<p>Agreed.</p>	<p>Paragraph 4.27 amended regarding shutters.</p>

Representation	Response by Neighbourhood Forum	Amendment to Plan
<p>additional security they provide against burglary and vandalism.</p> <p>They have also noted that in policy SPITAL3 clause C, the reinstatement of alleyways and passageways should take place only where it can be demonstrated that this will not increase the risk of crime.</p>	<p>Agreed.</p>	<p>SPITAL3C amended to reflect risk of crime.</p>
<p>13. We are generally supportive of the content of Appendix A. There are a lot of references to views of Christ Church over the tops of and between buildings, and while it is recognised that all of these hold some importance, it may not be realistic to expect all of them to be preserved without unduly holding back development in the area. There are also a number of references to street art, and it may be appropriate to provide more guidance on where street art would be appropriate or not – without further guidance, the statements about street art enhancing the character of the area could encourage a more indiscriminate approach that could inadvertently have the opposite effect.</p>	<p>Agreed.</p>	<p>Paragraph added to Section 4 and specific references to street art in Appendix A removed.</p>
<p>14. Heritage officers have praised Appendix B for including a significant amount of research, and think it constitutes a useful resource. However, the comment on current planning proposals in entry 11 seems inappropriate, and will date a document that is intended to last several years. And for entry 21, the only significant element mentioned is the panelled interior – but it should be noted that the protection of interiors requires the whole building to be listed. The proposed neighbourhood plan policies would provide some level of protection of the building as a whole, but the only way to control changes to the interiors through planning would be full listed building status.</p>	<p>Agreed.</p>	<p>Amendments made to Appendix B as suggested.</p>

Representation	Response by Neighbourhood Forum	Amendment to Plan
<p>15. It would be useful for Appendix B to contain maps showing only the heritage assets included in Appendix B, rather than also including those from Appendix D, to avoid confusion. Similar maps could then be produced for Appendix D, showing only the heritage elements identified in that appendix.</p>	<p>Agreed</p>	<p>Maps in Appendix B to be amended and new maps to be added to Appendix D.</p>
<p>16. Similarly, Appendix D is considered a useful catalogue of heritage assets in the area. We have the following observations on some entries: </p>	<p>Agreed.</p>	<p>Amendments made to Appendix D as suggested.</p>
<p>17. It would be useful to include some more detailed information in the supporting text about how the policy operates – this could be taken from paragraph 8.5.6 of the new London Plan. Although this would potentially be a duplication of the London Plan text, this is felt to be acceptable as the UGF is a new policy approach in Tower Hamlets, and the inclusion of some additional explanatory text would assist readers of the neighbourhood plan.</p>	<p>Agreed</p>	<p>Additional text added to Section 5.</p>
<p>18. The last sentence in clause B of this policy says that off-site provision of urban greening ‘should firstly address the urban greening projects identified in Section 5’. This is assumed to relate to the CIL project tables in what is now section 7 of the plan. We would suggest a slight re-wording here to read ‘For off-site provision, the projects identified in section 7 should be a priority’. As currently worded, the text suggests an obligation to deliver the CIL priority projects first – the suggested re-wording is to account for times when this may not be possible due to ownership or other constraints, and to allow applicants to then look at alternatives.</p>	<p>The list of projects is in Table 5.1 so it would be clearer to identify this table. Also, this table does not refer to CIL, therefore the suggested amendment is not necessary.</p>	<p>Amend SPITAL4(B) to refer to Table 5.1 rather than Section 5.</p>
<p>19. Elder Gardens - while this site clearly has some use as a tranquil space in a busy area, its primary role seems to be as an</p>	<p>The City of London Corporation was chased up and confirmed that it is supportive of the LGS designation.</p>	<p>Amend Appendix C to enhance justification.</p>

Representation	Response by Neighbourhood Forum	Amendment to Plan
<p>amenity area for a private housing development. Before supporting this designation, we would want to know the opinion of the landowner; and we feel more evidence is needed that the site is demonstrably special to the community or holds particular local significance.</p>	<p>The residents' group of the private housing development also support the designation. Elder Gardens is open to the public all day except after a certain time in the evening when it is residents-only to avoid anti-social behaviour.</p>	
<p>19. Christ Church Gardens – we would want to see some evidence of engagement with the church and to understand their position before fully supporting this proposal.</p>	<p>The church has not responded, despite writing to the rectory, the PCC and the diocese separately at Reg 14. The rectory did engage with the Forum during the stakeholder consultation process back in 2017-2018 but the churchyard was not discussed. The PCC discussed the neighbourhood plan and decided they would not get involved in neighbourhood planning matters. There has been strong support for LGS designation from resident and stakeholder groups.</p>	<p>None</p>
<p>19. Christ Church Gardens – On page 97, in the appendix, we would suggest deleting the final three paragraphs, from “In 2012 formal legal warning was issued...” to “making way for restoration of the Public Open Space”. The legal issues discussed here have now been settled, and the Council agrees with the restoration of the land as open space.</p>	<p>Noted and agreed</p>	<p>P97 text amended.</p>
<p>19. Chicksand Street Ghat – more evidence of this significance would help a plan examiner to reach a decision on the designation. While we have no objection to the site being designated as a Local Green Space, we would like to have an idea of the consultation response to this proposal before actively supporting it.</p>	<p>The owners are LBTH and they indicated they have no objection to LGS designation.</p>	<p>None</p>
<p>20. For figure 5.2 on page 27, it may be useful for the map key to use letters a-e, as these correspond with the lettering in policy SPITAL5.</p>	<p>Agreed</p>	<p>Figure 5.2 amended</p>
<p>21. Policy SPITAL6 on the Council-owned 'Ram and Magpie' site is considered unnecessary. The first clause of the policy is</p>	<p>Agreed.</p>	<p>Policy SPITAL6 and supporting text amended.</p>

Representation	Response by Neighbourhood Forum	Amendment to Plan
<p>read as aiming to 'allocate' the site as an open space specifically related to the activities of the city farm and the nursery that is currently on-site. However, the site is already allocated as a publicly accessible open space on the Local Plan policy map, and we do not believe it is appropriate to try to designate a specific use for an open space.</p> <p>The second clause of the policy then also seems to recognise the possibility for another use on the site, which could potentially conflict with the first clause requiring it to be allocated as an open space specifically for the farm and nursery. The existing nursery building on the site is also in poor condition and has significant operational limitations, and it is considered that adding further layers of policy protection to the site may constrain options for improvements.</p>		
<p>23. Officers have concerns on the feasibility of some of the individual items.</p> <p>...</p> <p>The consultation summary submitted at Regulation 16 stage should clearly demonstrate what consultation has taken place over these proposals in order to demonstrate that they have significant community support.</p>	<p>The specific points are noted, as is the need for the Consultation Statement to describe the consultation process.</p>	<p>Various detailed amendments made.</p>
<p>24. It is unnecessary to include the same tables at the end of the heritage and open space chapters and in their own chapter at section 7 – they only need to be included once.</p>	<p>Agreed</p>	<p>Table 7.1 deleted</p>

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SNPF Community Consultation

Stakeholder Research Report

September 2018



Table of Contents

Introduction and Background	2
Executive Summary	3
What do stakeholders value about Spitalfields?	3
What hinders stakeholders in the way Spitalfields works now?	3
How could the Neighbourhood Forum’s policies make Spitalfields better?.....	3
Methodology	5
Main Findings	6
What do organisations value most about Spitalfields today?	6
Unique vibrant community	6
Architectural heritage	7
Evolving community	8
Convenient geographical location	8
What hinders stakeholders in the way Spitalfields works today?	10
Increasing business rates and rents.....	10
Cultural homogenisation.....	10
Inadequate refuse collection and street cleanliness	11
Flow of traffic.....	11
Anti-social behaviour	11
Lack of affordable housing	12
How could the neighbourhood planning forum’s policies make Spitalfields better?	14
Protect community diversity	14
Provide support to the Bangladeshi community to revive Brick Lane	15
Develop a strategy to broaden evening activities	16
Consult to improve traffic circulation.....	17
Protect and improve existing green spaces/identify potential for more	17
Protect existing historic buildings	18
Consider impact of style and function of new developments	19
Conclusions	20
Appendices	21
Appendix A. Stakeholder Approach Letter/Email.....	21
Appendix B. Full List of Respondents.....	22
Appendix C. Interview discussion guide	23



Introduction and Background

The Spitalfields Neighbourhood Planning Forum (SNPF) is a group of local volunteers who, through seeking community involvement, will produce neighbourhood planning policies for the Spitalfields area. They have been designated by London Borough of Tower Hamlets for this purpose.

Part of the work of the SNPF is to undertake widespread community and business engagement to ensure the policies are based on local priorities. From this evidence base they will develop a plan which will be subjected to an independent examination and agreed by the community in a local referendum of businesses and residents at the end of the process. Once agreed, the local policies become legally binding.

The initial phase of public consultation was designed to gauge the "needs and priorities" of the neighbourhood. It comprised of an online quantitative consultation exercise and a qualitative consultation among key local stakeholders and interest groups. Alongside these initiatives the SNPF have also been researching the 'primary data' generated by the Office for National Statistics through the National Census and surveying initiatives undertaken by the Local Planning Authority (Tower Hamlets).

This Report covers the findings from the qualitative phase of the public consultation. During this consultation, members of the SNPF committee spoke with representatives of the most important organisations in the area (as identified by the Committee). These organisations included: larger businesses, representatives of business organisations locally, Tower Hamlets Council, the housing associations with significant representation in the area, civic society and amenity groups focused on Spitalfields, community organisations and elected representatives.

The qualitative interviews were carried out by members of the SNPF committee however, to ensure fair and impartial reporting of these interviews, the transcripts and summary notes have been analysed by Gracechurch Consulting, an independent research consultancy. This Report covers the findings of this analysis and has been written by Joanna Bolton (research consultant) and reviewed by Ben Bolton, Managing Director of Gracechurch Consulting who is a Full Member of the Market Research Society.



Executive Summary

What do stakeholders value about Spitalfields?

- The area is valued for its diversity, vibrancy and strong sense of community. For residents this is about the rich diversity of cultures, while for businesses this is predominantly about the successful mix of business and residential found in the area.
- Stakeholders value the architectural heritage of the area; the markets, the Church, the restored Georgian buildings.
- Spitalfields is seen as a constantly evolving community, one that doesn't and shouldn't stand still. Businesses value the way Spitalfields embraces change and aspires to constantly improve and adapt. Residents are positive about change but express concern about ensuring the unique feel of the area is not lost.
- The convenient geographical position of the area is valued. Transport links are good for workers commuting in and tourists visiting and being on the edge of the City, while having a thriving residential community, gives unique appeal as a place to both live and work.

What hinders stakeholders in the way Spitalfields works now?

- Increasing business rates/rents is a key issue for business stakeholders, potentially making the area unaffordable for small businesses.
- Fear of cultural homogenisation as small businesses are forced out of the area to be replaced by large retail chains.
- Refuse collection and street cleanliness is an area that LBTH is seen to be failing at, causing issues for both businesses and residents.
- The current road system is not thought to be coping with the increase in traffic in the area causing frustration and concern.
- Residents identify significant problems with anti-social behaviour, strongly linked to the night-time economy. Drug usage, prostitution, begging, homelessness and noise disturbances are becoming significant negative issues for residents.
- The lack of affordable housing is another issue for residents. High demand for private property in the area is pushing up rents generally, which it is feared will result in less demographic diversity.

How could the Neighbourhood Forum's policies make Spitalfields better?

Overall, policies need to focus on creating a successful balance between the continued growth and economic success of Spitalfields, and ensuring the existing local community thrives and benefits from this success. The SNPF should look to focus policies to:

- Protect diversity through making affordable business space available for new/small businesses and considering the impact of any proposed new developments on small businesses. Ensuring sufficient affordable housing of a good quality: thus maintaining a sustainable diverse community
- Provide support to the Bangladeshi community to revive Brick Lane; specifically looking at the unique visual culture of Brick Lane, careful use of colours, improved signage etc. and allow owners the freedom to create their own identities.
- Develop a strategy to broaden evening activities, away from just food and alcohol, to create a more diverse and sustainable range of activities: culture, art, theatre, sport etc.
- Run a full consultation to improve the flow of people, both pedestrians and vehicles, exploring potential pedestrianisation of busy areas and road closures.
- Protect and improve existing green spaces (specifically Allen Gardens) while identifying potential for more, through either new developments or small areas of existing unused land.



- Protection of existing historic buildings – not just facades but the interiors should also be considered
- Consider both the style and function of new developments to ensure the unique culture of Spitalfields is not adversely affected



Methodology

The SNPF committee identified a sample of 54 local organisations and representatives to include in this part of the community consultation. They were contacted and invited to take part in a 30-minute interview to discuss their views on what the area needs in terms of planning and development (see approach letter in Appendix A.).

A total of 27 stakeholders from various local stakeholder organisations agreed to participate in the research (a full list of respondents can be found in Appendix B.). Interviews took place between 13/2/2017 and 20/4/18.

Interviews were conducted by members of the SNPF committee, following a semi-structured interview guide (see Appendix C.). Conversations typically last for 30 minutes. When possible, interviews were recorded, and the recordings transcribed to be made available for analysis. When interviews were not recorded, interviewers took notes (of varying consistency and quality) which have been made available for analysis.



Main Findings

WHAT DO ORGANISATIONS VALUE MOST ABOUT SPITALFIELDS TODAY?

Unique vibrant community

Stakeholders representing both businesses and residents value the diverse and vibrant community that exists within Spitalfields. For businesses, the emphasis is predominantly on the mixed use of the area where both businesses and residents successfully co-exist. For residents, the emphasis is more on the cultural diversity and how people from very different backgrounds come together to create a unique community.

Business stakeholders strongly value the unique mix of both business and residential found in Spitalfields and feel this creates a vibrancy and community not found in other parts of London.

Diversity. Vibrancy. The different uses side by side. We know that sometimes it's quite difficult, but the vibrancy of Brick Lane alongside the residential area of the Brick Lane hinterland creates a unique culture. (Rachel Blake, LBTH)

It is completely mixed use and that's exactly why I love it. So, office occupants, fashion retail, food and beverage, the traders market, the parts market, the public spaces and the residents - we have got a blend of everything. (Jason Devlin, Spitalfields Estate)

Larger businesses feel the vibrancy of the area is particularly appealing for employees. Being located in an interesting environment which people can experience during lunch and after work is seen as a way of attracting and retaining talent.

Interesting public realm, vibrancy and community - you have to manufacture that at Broadgate, but it's embedded in Spitalfields. I think you'll see the private equity firms and hedge funds that will want to be in a more vibrant area move here – they're fed up with the stuffiness of Mayfair. (Mike Meadows, British Land)

It's a much more vibrant area than where we were before, there's more sense of community life, there's a range of people that live here, not just a place of work. ... The other business districts feel sterile in comparison, I really value that. Those other places feel much more contrived. ...it's much more innovative in terms of places to eat and good value, and it's very high quality. That view is shared by my colleagues. (Mark Mansell, Allen and Overy)

Residents also value the range and variety of businesses in the area and feel this contributes to a unique community where businesses and residents can thrive.

I love my neighbours, I love the variety of small businesses and things to do. I love its vitality. (Christine Whaite, Friends of Christchurch)



It is unusual in London because London is much more usually a smart area and a poor area, and they can be quite close together but they are not usually all mixed together in the same place and you get that overlap in Spitalfields which is unusual ... it is a pretty rich mix... but it's a kind of rich mix in that the restaurants are good, the houses are good the businesses are good. It's all piled in together. It's a village on steroids isn't it really? That's why it creates and attracts interesting characters.
(Rupert Wheeler, Spitalfields Society)

The diversity of cultures living and working in the area is valued predominantly by residents however businesses also acknowledge the cultural diversity and feel it adds to the unique vibrant atmosphere of the Spitalfields area.

There's a mix of different ethnic communities. As in Muslim, Bangladeshi, English. It's becoming very European as well. And the fact that there is a series of urban historic events that we, as a community, are just one layer of an ongoing, constantly changing cultural mix. (Matthew Piper, Spitalfields Community Group)

We love the fact that there are old East Enders here, there is a Bengali community here as well as other cultural communities. There are professional city workers, there are hipster, arty characters alongside people who have lived here longer and who have maintained and developed and looked after the beautiful old Georgian properties. I think it is that melting pot that Spitalfields is that we really appreciate.
(Andy Ryder, Spitalfields Parochial Church)

Spitalfields, specifically Brick Lane, is thought to have the largest concentration of Bangladeshi people outside Bangladesh, creating a compelling cultural mix within the area that attracts tourism.

Brick Lane, outside of somewhere like Bangladesh, is quite a big draw for Bangladeshis, so you're looking at the largest concentration of diaspora outside of Bangladesh. So, we were looking at that and saying, is it something that's very important to us as a community? ... we felt it was unique, if you look at how Bangladeshis aren't generally quite as forward. So, if you look at New York, it hasn't quite got the feel that it's got here. (Saif Osmani, Bengali East End Heritage Society)

Architectural heritage

Stakeholders value the architectural heritage within the area; the markets, the Church, the restored Georgian buildings and the Asian influences found on Brick Lane.

Its grand architecture which is aesthetically nourishing. I lived opposite the north-east flank of the church for many years and woke up to see the glory of Hawksmoor's Portland stone every day. It made me feel good. (Alistair Brown, Friends of Christchurch)

The historic residential streets bring a lot to the table. It's all very atmospheric and lovely. (Jason Zeloof, Zeloof LLP)

So, it's things like the Kobi Nazrul Centre, the community centres, and areas of significance, so a line of shops, things like lamp posts, for example, and those kinds of architectural features that are important to recognising this area as quite unique.
(Saif Osmani, Bengali East End Heritage Society)



I think it's got to be the heritage of the Huguenots, where they lived, where they worked, the street names. All of it has got to be, is what is left of Huguenots culture. I think that's what we all come here for and that's where the visitors come, they just want to learn more and more about these amazing and quite extraordinary people. So that's what I value the most. (Charlie De Wet, Huguenots of Spitalfield)

Evolving community

Both resident and business stakeholders feel that the community that exists within Spitalfields is constantly evolving. Historically, it has successfully absorbed and adapted to new cultures, which is largely seen as a positive characteristic of the Community.

Businesses value the way Spitalfields embraces change and aspires to constantly improve; creating a dynamic culture which is attractive to certain businesses. Residents are also positive about the evolution of Spitalfields, but express concern about ensuring the unique feel of the area is not lost for the sake of a desire to continually redevelop the area.

It [Spitalfields] is a constant evolution and things continue to change and I think that's also part of what makes Spitalfields quite successful. We use an awful lot of the history of Spitalfields, it helps us to work out how and why we manage the estate. For example, regarding the waves of immigration through Spitalfields over the years, we see this as just another transition and another part of that evolution and the site could be completely different in another 20/30/50 years' time. (Jason Devlin, Spitalfields Estates)

I don't want to see it [Spitalfields] frozen as it's the energy and the activity and the aspect of change which are really important to the District. (Toby Brown, Old Spitalfields Market)

This area has been in flux for centuries. It would be a disaster if we made it a museum. There's enough policy to protect the Georgian houses, and we have to encourage growth. (Jason Zeloof, Zeloof LLP)

One doesn't want to preserve the 'status quo', that sounds too static. But keep what is here, and good. Which is the small businesses. (Oliver Leigh-Woods, Spitalfields Trust)

I also think of people just not caring about the heritage, or even just not understanding why it's even important so probably it's just enormous demand for growth and rent and rates and there must be some managed growth instilled in the area somewhere. Can you imagine what would be like if 20 years times if we just saw the same again? I mean how many high rises would be in Brick Lane? (Charlie De Wet, Huguenots of Spitalfields)

Convenient geographical location

The geographical location of Spitalfields is valued by residents and businesses. The good transport links enable visitors and workers to easily access the area, although there are some concerns that more thought needs to be given to the flow of visitors coming from various stations.

There are lots of people who use the advice centre who were referred by other London boroughs. The transport links are valuable, we've withstood the test of time from that point of view. We would lose all of that if we went to Dagenham. It wouldn't be the same. We're ingrained in the geography of the place. (Karen Hart, Toynbee Hall)



Spitalfields' proximity to the City and the fact it has a thriving residential community, gives it a unique appeal as both a place to live and work.

I think also there is something about the heritage and the built environment that is very unique, especially so adjacent to Liverpool Street and the city fringe. (Rachel Blake, LBTH)

Primarily, being at the boundary of the City but not being in the city so that it was a place in which people can start small business and have markets and draw business from the city, but small enterprises could start. (Gentle Voice, Spitalfields Life)

Spitalfields is also considered to be part of 'cool' East London which has over recent years been associated with more creative and innovative industries.

Here we have enough proximity to the technology sector on Old Street but we embrace other industries – it's cool East London. (Sam Aldenton, Second Home)



Increasing business rates and rents

For business stakeholders the main impediment is the increasing business rates and rents; potentially making the area unaffordable for small businesses.

There is a sense that the Brick Lane restaurant trade is in decline as owners struggle to deal with rent/rate increases and therefore lack the ability to invest.

Rising rents...people [are] being priced out of the area and as a whole that [is] having a detrimental effect on the Spitalfields area and as the area becomes more generic, becomes less unique as a lot of smaller businesses and independents and creative people are forced out. (Gary Means, Alternative London Walking Tours)

The rents are just creeping up, creeping up, every year and so are the rates now. I don't see a bright future for us restaurateurs, especially in Brick Lane. (Guljar Khan, Brick Lane Restaurants Association)

So this place, that is defined by markets and the availability for affordable work spaces, that's really what's been key to this community for centuries now. That's very much challenged at the moment by rising property prices. (Gentle Author, Spitalfields Life)

You've now got chains at the top of Brick Lane. I'm not going to be judgemental about the kind of chains but there will soon be a real issue about the cost of business units on Brick Lane itself. And the Truman brewery and the kinds of businesses that operate there. The impact of business rate changes. I would hope that the way we sustain Brick Lane and what we like about Brick Lane is helping those small businesses to stay there. (Rachel Blake, LBTH)

Cultural homogenisation

Both residents and business stakeholders fear cultural homogenisation could occur if small businesses are not supported and retail chains are allowed to move into the area.

There is concern over the number of large-scale developments offering only large footplate office/retail spaces that have been permitted, replacing sites that previously housed small and diverse businesses. It is felt that further developments of this nature will have an irreversible impact on the cultural uniqueness of Spitalfields. Indeed, some feel this is already happening and beginning to negatively impact the culture, economy and social balance of the area.

I see the changes, pubs closing and the Fruit and Wool exchange, which contained over 100 small, local businesses and that's been shut down and gone to the wall, and that's been replaced by one single corporate international law firm. (Gentle Author, Spitalfields Life)

In the market, many of the shops and restaurants almost seem to be lost these days to the flagships and brands, and large corporates can afford to have one or two of those, small business don't. And that makes the area bland and we want to protect the identity by protecting that balance between small businesses and large ones. (Matthew Piper, Spitalfields Community Group)



Spitalfields Market is very unimaginative. It's a bit of a shame that they've got all those chains in there. Some celebration of Brick Lane, celebrating the diversity of the area, would be a great thing to do – it's a shame to have lost that. (Sam Aldenton, Second Home)

Inadequate refuse collection and street cleanliness

Both business and residents feel the local authority is failing to provide adequate services with regards to refuse collection and street cleanliness which is impacting the overall appeal of the area.

Everyone hates the waste – the services are totally rubbish! (Krissie Nicolson, East End Trades Guild)

I came to the Mile End market on Saturday and the streets around us were covered in litter and bags of rubbish piled up which is a poor illustration of what could be done. I think the amenities provided by the local authority on the very simple level could be much better. (Toby Brown, Old Spitalfields Market)

Flow of traffic

There is a view, held by both residents and stakeholders, that the current flow of traffic within the area is not working. The increase in popularity of the area has resulted in an increase in both pedestrian and vehicle traffic that the existing system is struggling to cope with.

Parking and traffic and roads in Tower Hamlets is just very tricky to get right because everyone has their own rat run that their entire life depends on it, but I think the sense of enclosure is to do with all the cars and so thinking about how cars could be managed in the area. (Rachel Blake, LBTH)

General circulation and access we are still pretty much dealing with the 19th century pattern and it's struggling. (Rupert Wheeler, Spitalfields Society)

Some recognise that there may be conflict between residents and businesses as to how best to improve this aspect; residents may wish to reduce traffic, while businesses are looking for efficiency of flow rather than a reduction.

So, there are a lot of issues of controlling the circulation which has a lot to do with the fact that it is this mix of residential and business use and what generates the conflict is that the two have very different access requirements One wants peace and quiet and the other wants busy, busy, busy all the time. (Rupert Wheeler, Spitalfields Society)

Anti-social behaviour

Resident stakeholders especially, identify significant problems with anti-social behaviour in the area, strongly linking it to the night-time economy. Specific issues highlighted include drug usage, prostitution, homelessness, begging and noise disturbances. There is a feeling that the Local Authority has failed to act responsibly when issuing late night licenses; choosing perhaps to maximise revenues even though there is a lack of resources to enforce licensing and insufficient police to deal with behavioural issues.

One of the biggest problems is vagrants and drug addicts and the homeless. I'm not talking about recreational drug use. People posing on the street. They're not customers of leisure premises. Some of it is connected to Daniel Gilbert House. The drug dealing that feeds into that and the drug dealers around Allen Gardens. But it's not a planning point, it needs the authorities to get on top of it. (Jason Zeloof, Zeloof LLP)



Night time economy – we have one block here, the residents rightly and understandably complain about the anti-social behaviour, the noise, drug dealing a bit of prostitution – nothing like it used to be but there's still some. (Paul Bloss, East End Homes)

I think it all comes down to resources. If you look at Westminster, they have an equally busy area, busier area, but they have better resources therefore it's fairly well managed. In Spitalfields, we've got the licensing aspects, the hostels, a flux of new developments, but no resources to throw at this area and the police in particular, if you look at the number of police on duty here, it's hopeless. (Matthew Piper, Spitalfields Community Group)

Excrement, urine, drug needles in alley ways, it could all be improved. There's lots of drug dealing on this street which is a problem for the surgery. This street is apparently worth £30K/week in terms of drug dealing, plus a lot of prostitution. More policing could help with that, moving them on or stopping them. The cleanliness of this alleyway is a horror, especially with the City close by, it feels really out of kilter. (Dr Ali Uddin, NHS Brick Lane surgery)

Lack of affordable housing

The lack of affordable housing within Spitalfields is a key concern for resident stakeholders. The increase in demand for private property which the area has been experiencing, has had the effect of pushing up rents generally. There is concern that this will result in certain demographic groups no longer being able to afford to live in the area, ultimately impacting the diversity of the community which is so highly valued.

Affordability is a problem, even in social housing. Private sector is coming in and pushing up rents. But ultimately, we're running out of housing stock. (Murselin Islam, Spitalfields Housing Association)

We're very conscious of the lack of affordable homes and people having to move to somewhere more affordable. Our aim as an organisation has always be to look at ways of increasing truly affordable homes. (Paul Bloss, East End Homes)

This could all become absorbed into the greater City and the identity of this place is completely lost, it becomes a kind of Knightsbridge, or a place where a lot of rich people are living in expensive houses and you've got a lot of chain stores, and offices and nothing else. (Gentle Voice, Spitalfields Life)

The increasing desirability of the area is also thought to have led to property speculation, with prime properties remaining empty, as seen in Kensington and Chelsea.

Well too much money is not good for the historic aspect... it's destroying a lot of historic fabric quite unnecessarily. And there are threatening to be too many houses that are just standing empty because the people can afford to own them without using them. It's an interesting and a fairly unusual threat in terms of residential areas in the country although it certainly afflicts places like Kensington and Chelsea. (Rupert Wheeler, Spitalfields Society)

The social housing available within the area is generally of a poor quality, lacking basic facilities and lacking investment. Due to the lack of social housing within the area, people whose desire it is to stay within the community are now being offered housing outside the borough.

There's not enough housing, it's a very bad problem in a densely populated area like this. Lots of people who need to be rehoused don't want to leave the Borough, but



that's what they're being offered, lots of people are being moved out of the Borough.
(Dr Ali Uddin, NHS Brick Lane surgery)

Some of the housing is not up to scratch in terms of quality, Jacobson House for example is very poor quality. They don't have lifts which is a problem for the elderly and people with multiple chronic illnesses, they could fix that. (Dr Ali Uddin, NHS Brick Lane surgery)



HOW COULD THE NEIGHBOURHOOD PLANNING FORUM'S POLICIES MAKE SPITALFIELDS BETTER?

Overall, the policies developed by the SNPF need to focus on creating a successful balance between the continued growth and economic success of Spitalfields, whilst ensuring the local community benefits from this success and the history/heritage of the area is respected and preserved.

Although there is strong consensus over how the SNPF could improve the area, for example development of green spaces, improving traffic flow, ensuring considerate development; there are also some opposing views between resident and business stakeholders. This is particularly stark on views of the balance of residential versus business property usage, where some resident stakeholders feel that, despite the area being designated a business zone, there should be more residential development in the area, whereas some businesses feel there is already too much residential property and that more should be converted into business units.

Another thought for Brick Lane District Centre, there's encouragement for retail and frontages, I think there should be encouragement to change residential into commercial in certain cases. In some ground floor places it would be good within the town centre, changing residential to commercial would be good, we should be encouraging work space. (Jason Zeloof, Zeloof LLP)

I know that the Council slightly regret allowing all the houses to be turned back to houses and it's a shame more of them aren't businesses still because it's swung too residential and you get that strong residential focus and that's when the politics changes and then it's quite hard to maintain that rich mix of uses and scales and wealth and endeavour. (Rupert Wheeler, Spitalfields Society)

It just seems relentless, wherever you go, it's just shops and restaurants and it would be quite nice if there was more residential, and affordable residential, for people who'd need homes near the city. (Charlie De Wet, Huguenots of Spitalfields)

Protect community diversity

Both resident and business stakeholders highly value the diversity found within Spitalfields. There is a strong desire to ensure the history of supporting small business enterprise is maintained and that there is adequate safeguarding the provision of affordable housing. Stakeholders make various suggestions around how the SNPF could develop policies to protect this diversity.

- Making affordable business spaces available for new/small businesses. Ensuring spaces of small square footage remain within the area and looking at ways to reduce costs without necessarily having unsustainably low rents, for example, office sharing, short term contracts, shared facilities.

Some sort of protection within the plan, to look after smaller businesses, smaller enterprises within the area, to prevent them all being swallowed up by large corporations with a lot of money. (Matthew Piper, Spitalfields Community Group)

Providing the right kind of workspace is key. What's unique about Blossom street is 300,000sq ft in total but the largest floor plate is 20,000 square foot. We think the smaller businesses will be key – lots of leases will be shorter than the larger banks usually take. We think the key to retaining the smaller businesses that are already here is mixing them with the new ones. (Mike Meadows, British Land)



I'm against affordable offices and subsidy. It has unintended consequences around rent doubling if they grow. What planning policy should encourage is about lease terms and fit out costs, sharing services and meeting rooms. Affordable might be about, month-by-month paying. Particularly in the tech sector, small businesses can be high value so it's not so much about cost for them. (Mike Meadows, British Land)

- Considering the impact of any proposed new developments on small businesses in the planning approval phase. Maintaining a sustainable small business community should be a priority when new developments are evaluated.

They (the local council) ought to use planning, they could limit shops joining together, they need to be proactive in supporting the local economy and they're not. (Gentle Author, Spitalfields Life)

- Preventing large developers buying up adjacent lots to turn into larger buildings, which results in the area being owned by a few, powerful developers.

So the policy adopted at Redchurch Street might be one way that the Council could retain the diversity and rich mix that we were talking about earlier on ... what policy will preserve that richness and stop it becoming monocultural or dominated by one big developer or landowner... you can't stop them buying stuff and assembling things through the planning process but what you can do is stop them putting it all into one lump and putting one massive building on it or one use. (Rupert Wheeler, Spitalfields Society)

They may be in a conservation area but the conservation doesn't seem to be good enough and we are very concerned of the pressure that the City and big developers have upon the area and they desire to take whole blocks that are divided into lots of little buildings and turn them into a monoplane building that takes a whole block. That's a real danger in this area the moment and that's happening at Fruit and Wool Exchange, it's threatened at Norton Folgate and it's happened over half the market, and it's a real threat to anything that's not listed. (Tim Whittaker, Spitalfields Trust)

- Ensuring sufficient affordable housing of a good quality: so maintaining a sustainable diverse culture.

The edginess has brought in new people, to a degree. They are sort of in front of the City expansion ... but they're going to have to go soon because property prices are going up, rents are going up there isn't the art spaces available any more. So, there is a churn and it is changing but for us it's how we continue to try and maintain some degree of demographic diversity within that framework. (Paul Bloss, East End Homes)

Provide support to the Bangladeshi community to revive Brick Lane

Both resident and business stakeholders value the unique Bangladeshi heritage found in Spitalfields but recognise that the restaurant trade on Brick Lane is struggling to compete with the influx of new eating and drinking options now available in the area. There is appetite, both from stakeholders representing the Bangladeshi community and other stakeholders, for the SNPF to explore ways in which to support the revival of Brick Lane.

- Preserve and improve the unique visual culture of Brick Lane; use of colours, signage, lamp posts. At the same time, allowing business owners to have the freedom to create their own unique identities that develop organically.



It's also part of the visual culture. If I look at it, it's not just something we take out of archive and say "hey, this is your Bangladeshi" which happens a lot in certain circles, other heritage projects as well. Sometimes it's about creating the new, and I think, that dynamism. (Saif Osmani, Bengali East End Heritage Society)

Take, for example, the lamppost issue, where there's a petition happening at the moment, it is and was designed as a bespoke design for the area a couple of decades ago. And that was replaced with what I would describe as quite generic street lamps, I mean, Brick Lane could look like anywhere else in England. In a way, I think that's a little bit short-sighted, we find it short-sighted, because what's unique about London is that it's able to absorb all those aspects of ethnic minorities. (Saif Osmani, Bengali East End Heritage Society)

- Consult with the Bangladeshi community and jointly develop a cohesive strategy with the restaurants to improve their commercial offering: improved menus, quality service, quality décor/ambience/environment.

Develop a strategy to broaden evening activities

Stakeholders feel there is too much focus on food and drink within the area which is creating many of the anti-social behaviour issues previously highlighted. To offset this over reliance on food and drink, stakeholders suggest developing opportunities for a more diverse and sustainable range of evening activities, e.g. arts, music, sport etc.

We are not here to sanitise the area, but neither are we here to give it over entirely to night clubs and so on. It need to be about much more than just food and drink. In the West End it's about theatres and galleries and late-night shopping and lots of other things in Spitalfields it seems to be about food and drink and it shouldn't be. (Rupert Wheeler, Spitalfields Society)

- Review the strategy for issuing licenses for the area to ensure resources do not continue to be overstretched and that a balance between food and drink and other entertainment options exists.

I think licensing constraints and planning constraints. I think we would be and we are very keen to – our events licence for example doesn't include Saturdays and Sundays I think only to 4pm, I think we are quite keen to push it to 6pm but we are not going to do that until after we've looked at the planning for here rather than muddying the waters. (Jason Devlin, Spitalfields Estates)

I think rather than just constantly fighting licences and food outlets we ought to be responding in a more positive manner saying that we accept that we are an inner city area we accept that we have attractions twenty four hours a day but they need to be managed in that rich diverse way that we were talking about right at the outset and not just become a monocultural drinking den or a kind of fast food outlet. (Rupert Wheeler, Spitalfields Society)

- Look for opportunities to create more public space for the community within new developments, to allow for cultural events during the evenings and weekends.

I think it's providing spaces for people to do things for free or affordable amounts that would be great ... There is little live music available now, street theatre - I don't see it. I think we owe it to the younger generations to make sure there are thriving cultural activities going on. People are keen to do them it's just providing the spaces for them. (Toby Brown, Old Spitalfields Market)



That needs an element of partnerships of people being brave enough to let things happen in the spaces there are in parks and in public spaces and in buildings and we try and encourage it by being pro-active about it and determinedly saying we want to have artistic and cultural activities available to people in the area. (Toby Brown, Old Spitalfields Market)

Consult to improve traffic circulation

Both resident and businesses feel there are significant issues with the current road system and the flow of pedestrians. Although some efforts have been made to address this, the current sentiment is that this has not been done comprehensively enough and that a full community consultation should be undertaken.

British Land, Exemplar, Truman Brewery, these are big landowners who could actually - if we engage them actively – help collectively improve things and put things right and resolve a few bottlenecks and open up opportunities so that business could sit better with residential and big business can sit better with small business. (Rupert Wheeler, Spitalfields Society)

I think that the planning forum should probably look into ways of controlling permit ability in certain parts of Brick Lane and the area. Maybe commission some sort of a study where certain streets like Fournier are protected certain times of the week. (Matthew Piper, Spitalfields Community Group)

Getting rid of car parking spaces on Brick Lane, some of the bays, that would really help. It's going towards Carnaby Street or Covent Garden. I can see there being no parking on Brick Lane and specific hours for servicing in terms of traffic. (Jason Zeloof, Zeloof LLP)

Protect and improve existing green spaces/identify potential for more

Stakeholders acknowledge the importance of the existing green spaces in an area of very limited green space.

- Allen Gardens is highly valued by the residents, but stakeholder suggest improvements that are needed: maintenance of and enhancements to play equipment, making the space safer (addressing the issues of drug users/drinkers in the space) and potentially developing a community café/centre.

The only green space we have is Allen Gardens, it is fairly plain at the moment, but it's amazingly well used, but it would be nice to have slightly better facilities there. At the moment there's a slightly unpleasant part to it, because it's used for drugs and drinking etc. (Matthew Piper, Spitalfields Community Group)

Allen Gardens, we have not done anything with, but yes, we have some dreams about how we would love to see that park a much safer park for children to play in. We believe there are some easy wins there that could benefit the park, the farm, the play group, the neighbourhood – blessing Spitalfields and keeping the green space the same size it is. (Andy Ryder, Spitalfields Parochial Church)

- Some suggest looking for opportunities to develop 'pocket parks' in unused small sites that are not of interest to developers. These could potentially be turned into community gardens for residents and workers to use.



I'm sure that there is more that we could do around pocket parks and I think one great thing that the neighbourhood forum could do within its plan is identify opportunities for pocket parks. (Rachel Blake, LBTH)

It might be a good idea to look at what open space there is, because there is quite a lot of open space that is not green open space or even useful open space, various courtyards, derelict sites etc. (Rupoert Wheeler, Spitalfields Society)

- The SNPF could also look to increase the amount of green space by ensuring new developments incorporate 'green' elements for public usage. At the same time there is an opportunity to look at incorporating 'green development' within existing housing estates e.g. court yard gardens, raised beds etc.

There must be space on the estates for further greenery or planting. There is some really lovely planting just north of Cheshire street in the Weaver's Ward rather than the Spitalfields Ward, but instead of having bollards to stop cars you just have big railway sleeper planters and there are lots of ideas like that that I think the neighbourhood forum would be great to bring forward that kind of thing. (Rachel Blake, LBTH)

Protect existing historic buildings

Stakeholders agree that Spitalfields contains some very important and special architectural heritage that should be preserved, however there is some disagreement over how much preservation is still needed. Some feel that all the important buildings are already protected and that the forum should focus on policies around new developments; whilst others feel there are still buildings/architectural features within the area that need protection.

There's enough policy to protect the Georgian houses, and we have to encourage growth. We need to be careful not to cross the line into preservation. (Jason Zeloof, Zeloof LLP)

There's a real danger that we ignore, and only concentrate on superlatives. And therefore, if that happens, anything that isn't listed or isn't considered great architecture and grand is disposed of and lost. You'd end up with a very skewed view of the past. You'd only see the houses of the 'great and good' and the great thing about Spitalfields is it has all the rest, that is not listed, mostly. (Tim Whittaker, Spitalfields Trust)

- Some also feel that the protection of the interior of historically important buildings, rather than just facades, is important. As well as preserving historically important engineering features, it could also be beneficial for smaller businesses by enabling more flexible workspaces.

Some of those [buildings to be locally listed] may refer to the interior of the building where it has an interesting and fairly unique function like 106 Commercial Street. The old omnibus stable with those great big cobblestone ramps those are a of great social and economic historical value. Architecturally they are not much but engineering-wise they are pretty interesting. The building is not listed but that is as significant an element as the nicely gauged brick facade onto Commercial Street. (Rupert Wheeler, Spitalfields Society)



I think is very interesting it to look at what happened in Shoreditch with the tech industry, because what happened there is that you had all these empty spaces that were ex industrial because the cabinet and clothes making industries kind of left Shoreditch, and the tech industry grew up there quite naturally to begin with, nobody tried to make it happen there because those spaces were so flexible. (Gentle Author, Spitalfields Life)

Consider impact of style and function of new developments

In addition to identifying and protecting historical buildings, there should be careful consideration given to the impact of new developments within the area. This is about ensuring new developments are sympathetically designed to fit in with the historical architecture but also considering how the proposed use of new developments will impact the existing culture of Spitalfields.

I am not personally against pastiche, and I think there are some opportunities in Spitalfields to do some developments that reflect the historicity of the area and could be done sensitively and well. So, height, retaining frontages, retaining buildings where possible and looking creatively at new-build so that it might bed in better with the existing architecture. (Andy Ryder, Spitalfields Parochial Church)

What we have here is an Urban Environment which has proved to be flexible, and very creatively successful for centuries and that needs to be respected. This idea that you just bulldoze that and put in street to street office walls is very short-sighted because that isn't what the future will be like. (Gentle Author, Spitalfields Life)

I believe for example that if the Spitalfields market were much more imaginatively organised, all the shops would do better, to me what it's really about isn't actually about money, it's about failure of imagination. (Gentle Author, Spitalfields Life)



Conclusions

- There is a consistent view from stakeholders, representing both residents and businesses, as to what they value most about Spitalfields. There is a strong sense of it being a very special and unique part of London and stakeholders share the aspiration for it to continue to be so.
- There is overlap regarding the negative issues that both resident and business stakeholders experience. There are problems with traffic flow and anti-social behaviour impacting the whole community, that all agree need to be addressed.
- The increased popularity of the area is also creating potential issues for both residents and businesses as rents/rates for businesses and property prices increase. The negative impact of this is seen as being a loss of the diversity, both within the residential community and the type of businesses, which is felt to be at the heart of what makes Spitalfields special.
- Opinions regarding the future development of the area vary: some business stakeholders prioritise economic growth/prosperity, while some resident stakeholders place the emphasis on preserving and improving existing sites.
- Ultimately, the majority agree that the area should continue to be developed – or at least accept that it will happen - so the focus for development going forward needs to be on creating a balance between development for purely economic advantage, and development to provide community improvements. This needs to be sensitively managed while acknowledging that not every stakeholder's needs or viewpoint can be satisfied by the SNPF policies.

We love the old buildings and they should be kept, however that doesn't mean you can't do other things and that you can't have beneficial development. We are operating in the real world and you can wish all you like that the world was just how you want it – but you can choose to do something, or you can do nothing. (Paul Bloss, East End Homes)



Appendices

Appendix A. Stakeholder Approach Letter/Email

Subject Line: Local Stakeholder Consultations: Spitalfields Neighbourhood Plan

Dear Fred/Mr Bloggs

I am writing to you in my role as a committee member of the Spitalfields Neighbourhood Planning Forum.

You may be aware that the Neighbourhood Forum is a group of local volunteers seeking community involvement so that over a period of (probably) two years we can produce neighbourhood planning policies for Spitalfields. We have been designated by London Borough of Tower Hamlets for this purpose.

Our work will be based on widespread community and business engagement and underpinned by a proportionate evidence base. Our plan will be subjected to an independent examination and needs to be agreed by the community in a local referendum of businesses and residents at the end. Once agreed, our local policies become legally binding and carry the same weight in planning decisions as those in the Tower Hamlets Local Plan.

In practice what that means is that we as a local community get more of a say over what our local streetscape looks like and how development in our area can be shaped better to reflect the needs and desires of local businesses and residents.

We are starting our community engagement by seeking to talk to representatives of the forty most important organisations in the area (including the bigger businesses, representatives of business organisations locally, Tower Hamlets Council, the housing associations with significant representation in our area, civic society and amenity groups focused on Spitalfields, community organisations and elected representatives). The feedback from these conversations will help us shape what questions we ask when we engage more widely with residents, workers and other businesses.

Would you be prepared to spend half an hour with a couple of members of the Spitalfields Neighbourhood Forum committee to share your thoughts on what the area needs and answer a few questions about how you/your organisation sees Spitalfields now and what it might like to see for the area in the future? We would very much appreciate your input and would be happy to meet you in your office or somewhere locally in Spitalfields to have the conversation.

Yours sincerely (if name known) or Yours faithfully (if name unknown)

<My Name>

Spitalfields Neighbourhood Planning Forum



Appendix B. Full List of Respondents

Stakeholder Type	Respondent Name	Organisation
LBTH	Rachel Blake	LBTH Cabinet Member for Strategic Development
LBTH	Ellie Kuper-Thomas	LBTH Strategic Planning, Plan Making Team
LBTH	John Pierce	Weavers Ward, LBTH
Business	Sam Aldenton	Second Home
Business	Toby Brown	Old Spitalfields Market
Business	Guljar Khan	Banglatown Restaurants Association
Business	Krissie Nicolson	East End Trades Guild
Business	Mike Meadows	British Land
Business	Jason Zeloof	Zeloof LLP
Business	Gary Means	Alternative London Walking Tours
Business	Jason Devlin	JP Morgan (New Spitalfields Market)
Business	Mark Mansell	Allen & Ovary
Business	Jeremy Tarn	Tarn & Tarn
Business	Gentle Author	Spitalfields Life
Civil Society/Residents	Murselin Islam	Spitalfields Housing Association
Civil Society/Residents	Karen Hart	Toynbee Hall
Civil Society/Residents	Matthew Piper	Spitalfields Community Group
Civil Society/Residents	Andy Ryder	Spitalfields Parochial Church
Civil Society/Residents	Christine Whaite	Friends of Christchurch
Civil Society/Residents	Rupert Wheeler	The Spitalfields Society
Civil Society/Residents	Ali Uddin	NHS Brick Lane surgery
Civil Society/Residents	Mhairi Weir	Spitalfields City Farm
Civil Society/Residents	Jon Shapiro	SPIRE
Civil Society/Residents	Charlie De Wet	Huguenots of Spitalfields
Civil Society/Residents	Saif Osmani	Bengali East End Heritage Society
Civil Society/Residents	Tim Whittaker	Spitalfields Historic Buildings Trust
Civil Society/Residents	Paul Bloss	East End Homes



Appendix C. Interview discussion guide

We have two parts to what we'd like to talk to you about today. The first is we'd like your views on Spitalfields and how it works now and how it could work in the future, to benefit what your organisation does. The second is we'd like to tell you a bit more about the Neighbourhood Forum and we'd like to ask for a little more of your help in our activities.

a) Views on Spitalfields:

What does your organisation value most about Spitalfields as it is now?

What hinders your organisation, in how Spitalfields works at the moment? Or what are the biggest problems you see that impact your business in Spitalfields at the moment?

How could the Neighbourhood Forum's planning policies make Spitalfields better? What improvements or changes would you like to see?

Is there anything else that you'd like to comment on about how Spitalfields could be improved?

b) What the Neighbourhood Forum does, and your help:

The Neighbourhood Forum is led by volunteers from the community. Spitalfields is designated as a 'business area' so we have equal representation from businesses and residents on our Forum Committee. The Localism Act which was passed in 2011 means that, if we go through the right process (including lots of community consultation and a vote at the end), we can put in place neighbourhood planning policies for our area which give us as a community more of a say in how we shape the streetscape and the future development of the area. For instance, most of the precious green spaces we have in our area are not guaranteed in law as public spaces – so we think we'd like to change that and get the Neighbourhood Plan to give legal status to those green spaces so they can't be built on or interfered with. We have been designated by London Borough of Tower Hamlets to perform this role.

We're trying to make sure that our Neighbourhood Plan reflects the local community's interests (businesses and residents) – so we're going to run extensive community and business engagement with everyone over the period that we're working on the Neighbourhood Plan. We need help to do this and there are three immediate priorities we would like to explore with you:

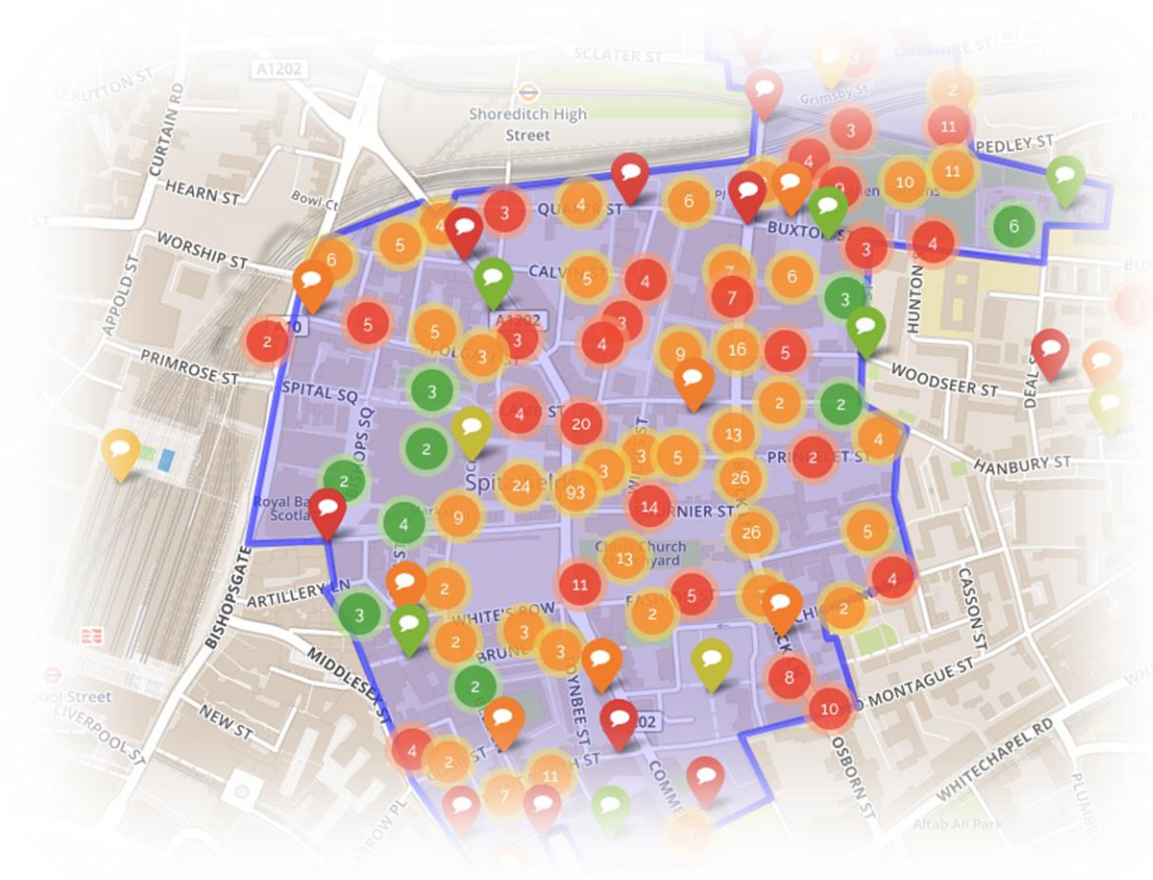
i) The first is money to pay for administration. As a Neighbourhood Forum we can access a certain amount of Government funding but, quite rightly, the rules around what we can use it for are strict. One of the things we need more help with (particularly as most of our Committee members are in full time jobs so have limited time) is administrative support. We'd like to have someone on a part time contract to help us run our admin and we need contributions from organisations be able to pay them. If larger organisations (particularly the commercial businesses) could offer us £2-5k each, that would give us the kind of budget we need to afford this support.

ii) The second is 'in kind' help. Some organisations can help us with offering us their office space to run public consultations or our Committee meetings. Some might be able to help with offering pro bono professional advice (so we'd love the law firms and the digital design businesses, for instance, to help us by contributing time from their professionals for getting our planning policies to be legally robust, and getting our digital communications to be really engaging and informative). Others might be able to help with printing costs or running a survey?

iii) And lastly, we'd like to be able to send a short survey to your staff/members/supporters to get their views on how they feel about working in Spitalfields and what they would like to see for its development in the future. Workers who come into the area every day are an important group for us to understand and you could really help us by facilitating our short survey going out to your team here.



Spitalfields Commonplace Outreach report 2018/19



Index:

• Abstract	3
• Engagement	4
• Key issues	8
• Tag analysis:	11
• Locations	12
• Brick Lane	13
• Fournier St	16
• Old Truman Brewery Estate	19
• Old Spitalfields market	22
• Spitalfields General	25
• Commercial St Centre	28
• Other	31
• Why do you feel this way?	36
• By location	37
• What improvements would you like to see?	50
• By age and gender	51
• By location	52
• Other improvements	71
• Agreements	72

Abstract

This report aims to develop a plan for sustainable, profitable and beneficial change for Spitalfields which allows growth whilst protecting our heritage.

This is done by looking at the four main areas set out in the 'project vision': the built, economic, natural and social environments.

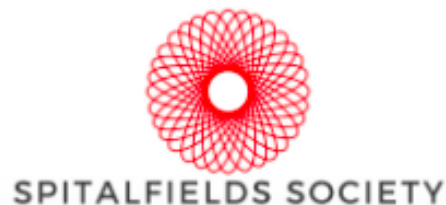
The Mosque on Fournier St, many of the open spaces (Elder Gardens, Allen gardens) and the rich heritage of the Brick Lane conservation area were constantly praised and there was a call for further protection in these areas and management strategies to reduce antisocial behaviour.

Many wanted to see commercial development in both sides of the Old Truman brewery. There was a strong debate over the Christ Church churchyard, and general disapproval over the Time Out plans on Commercial St.

Overall the general improvements that were wanted included better waste management throughout each area, reduced antisocial behaviour and drug related activity and various traffic/pedestrian improvements.

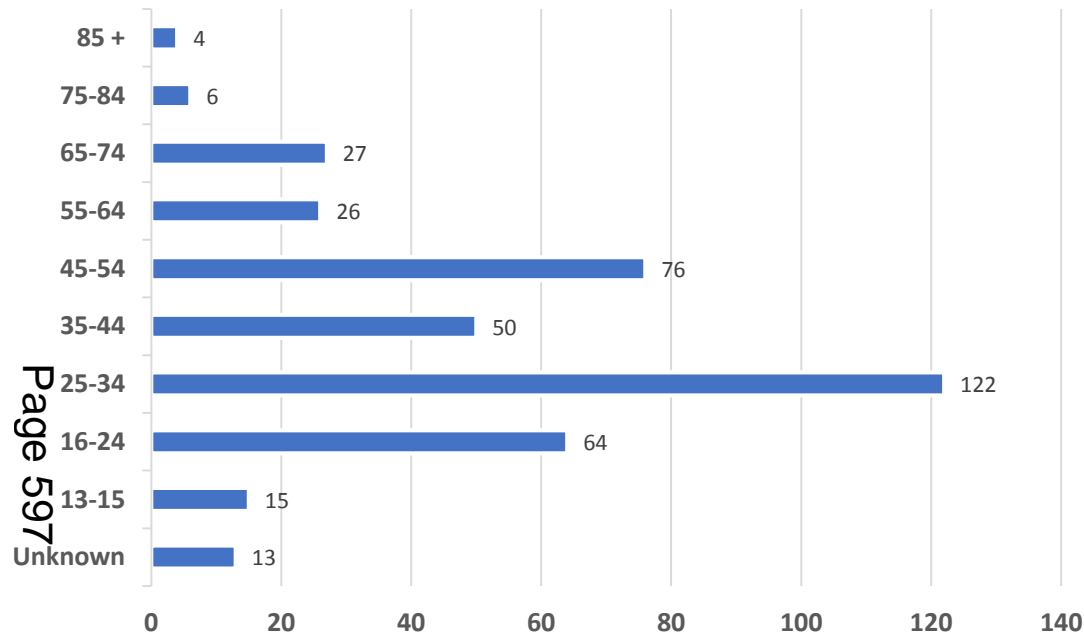
Engagement Summary

- **1809** people visited the site in total.
- **403** of these people also interacted in some way with the site:
 - **102** commented
 - **232** surveyed
 - **126** agreed with one or more comment
- There was a total of **2094** interactions with the site of which:
 - **602** were comments
 - **1492** were agreements
- **1074** visitors were directed to the site via 'spitalfieldsforum.co.uk'.
- **132** from Facebook and **120 from the commonplace website.**
- The others were made up mostly from Twitter, google and the Spitalfields neighbourhood planning forum.



Age and Gender

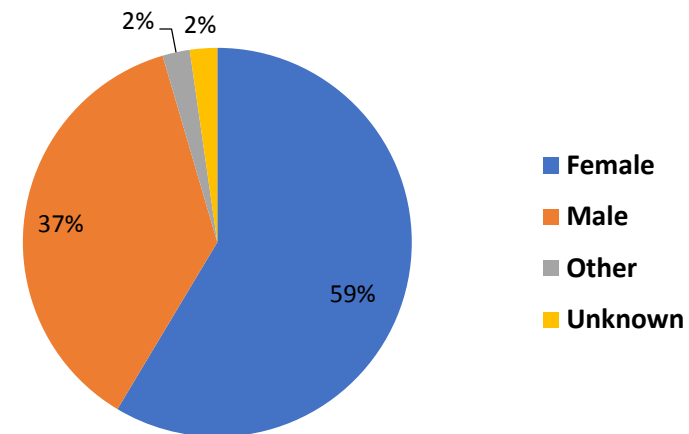
Age of contributors



The largest age group to contribute were between the ages of 25 and 34. a majority of contributors were between the ages of 16 and 54.

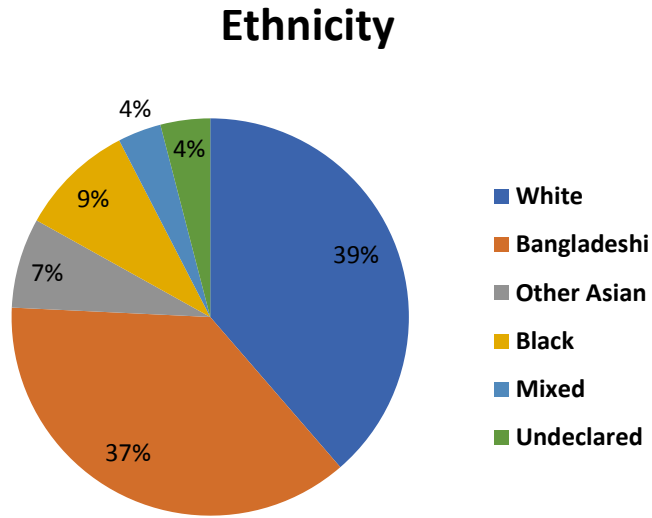
Of the 396 contributors over half were female.

Gender



Ethnicity

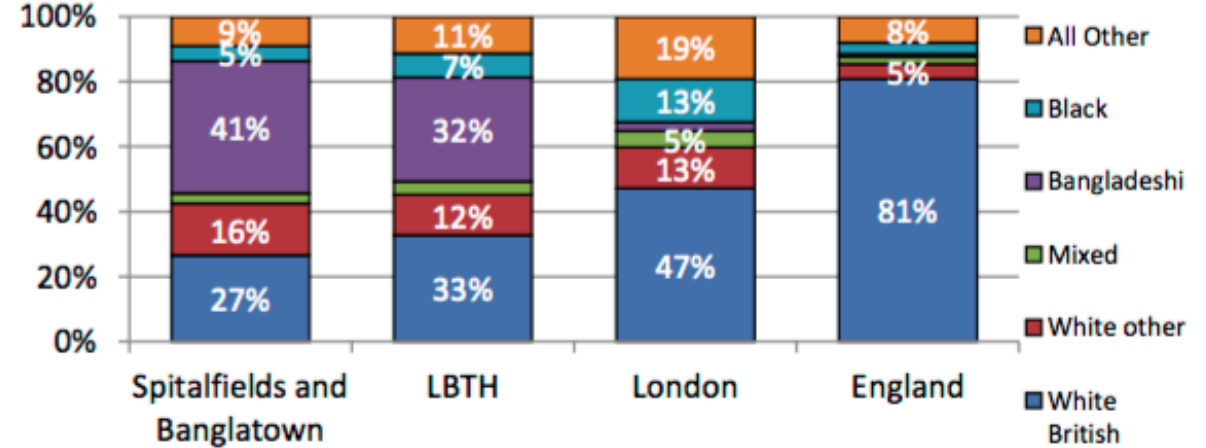
Page 598



The largest group of contributors were white (**155**), followed closely by Bangladeshi (**148**).

Ethnicity

Figure 2: Ethnicity



(Source: Census 2011 QS201EW - Ethnic group)

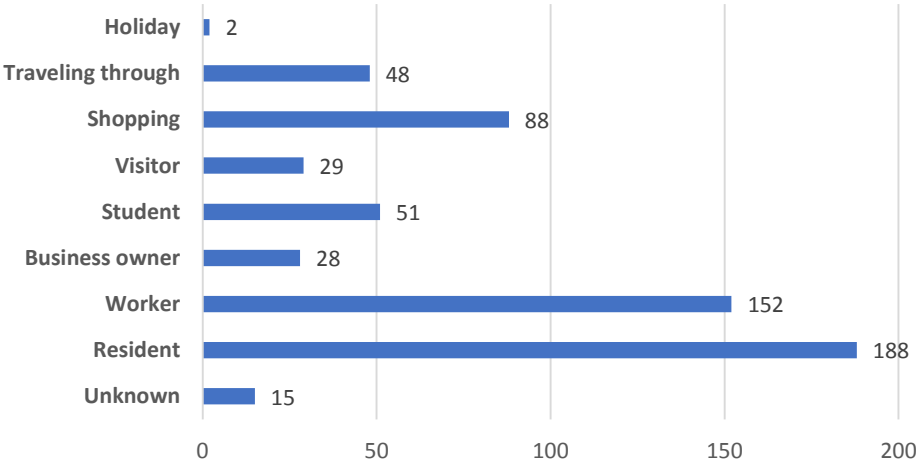
This graph, taken from a Ward Profile (2014) of the area by Tower Hamlets using data from the 2011 census, shows this to be almost exactly representational of the residential area and fluctuations can be allowed due to the number of people surveyed but not residents of the area.

Source:

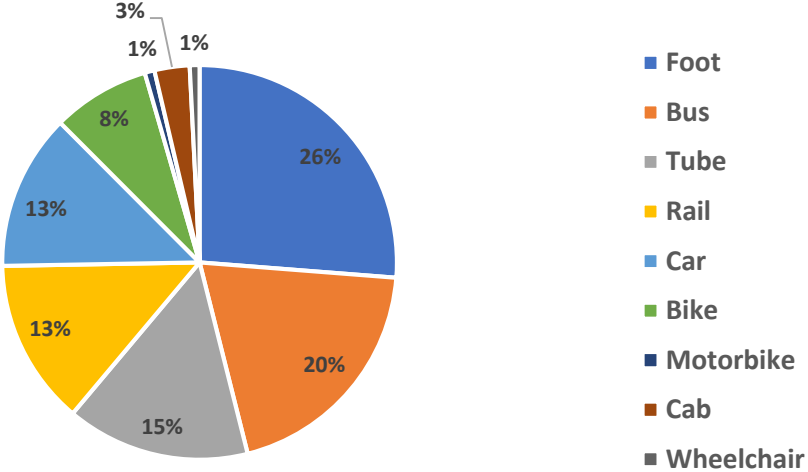
https://www.towerhamlets.gov.uk/Documents/Borough_statistics/Ward_profiles/Spitalfields-and-Banglatown-FINAL-10062014.pdf

Transport Mode and Connection to the area

Connection to the area



Transport Mode



Page 599

Residents were the highest proportion of visitors, followed by workers to make a majority.

Foot and bus were the most popular modes of transport.

N.B. the high proportion of people using wheelchairs (and pushchairs) as pavement and road quality consistently come up as issues throughout the report.

In general, these were the key issues raised:

- **Waste**/litter/management
- **Traffic**/pedestrian safety/parking/cycling facilities
- **Antisocial behaviour**
 - Particularly drugs
 - Safety
- **Conservation** and protection
 - Heritage
 - Open space
 - Businesses
- Issues concerning **housing**/accommodation and community.
- **Accessibility**
 - Wheelchair users and pavements.

Different aspects of antisocial behaviour mentioned in this report: (referred to usually as ASB)

- **Drugs** (mostly dealing) and drinking:

- Where: Cheshire St, Allen gardens, Buxton St, Elder St, Quaker St, Grey Eagle St, Spital St, Brick Lane, Bell Lane, Strype St, Brune St, Commercial St, Old Montague St, Wilkes St/Fournier St (more than 10 comments here), Chicksand park. (Essentially everywhere...)

- **Urination**

- Where: Commercial St N, Braithwaite Underpass, Brick Lane, Peck's yard, Wentworth St Alleyway, Christ Church

- **Vandalism:**

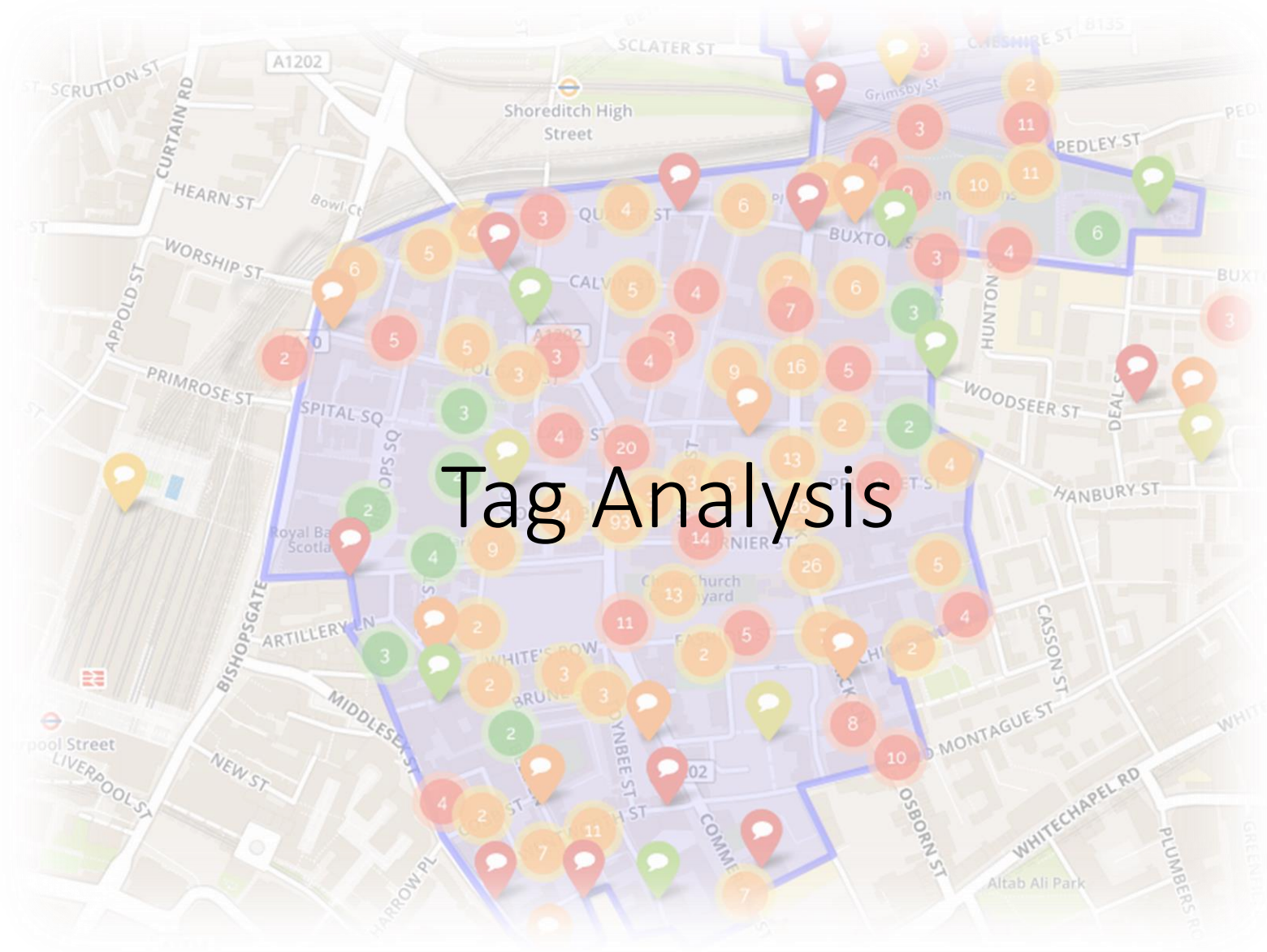
- Where: Calvin St, Grey Eagle St, Wilkes St,

- **General:** (crime/unsafe behaviour)

- Where: Calvin St, Woodseer St, Brick Lane,

Urban Greenery

- Preservation of open space and 'street planting' to increase urban greenery a key issue. Praise for the city farm and a keen interest in the churchyard/garden shows this to be popular within the community.
- There was **praise** for: Spitalfields City Farm (and suggestion that it is expanded), Quaker St trees, Elder Gardens, Bishop's Sq, Eric Elstob's Wisteria (puma court).
- **Protection** called for: Allen gardens, Elder Gardens (from surrounding development), Churchyard front garden (from talk of it being entirely paved), .
- Possibility for **further** urban greenery suggested on: Fleur de Lis St (north side), White lion yard, Point A hostel (Folgate St), Jerome x Calvin St, Corbet Place x Grey Eagle St, Links Yard.
- Debate on School building and Christ Church Churchyard.
- Further Comments:
 - Brushfield St trees need watering.
 - Heneage St trees blocking pavement.

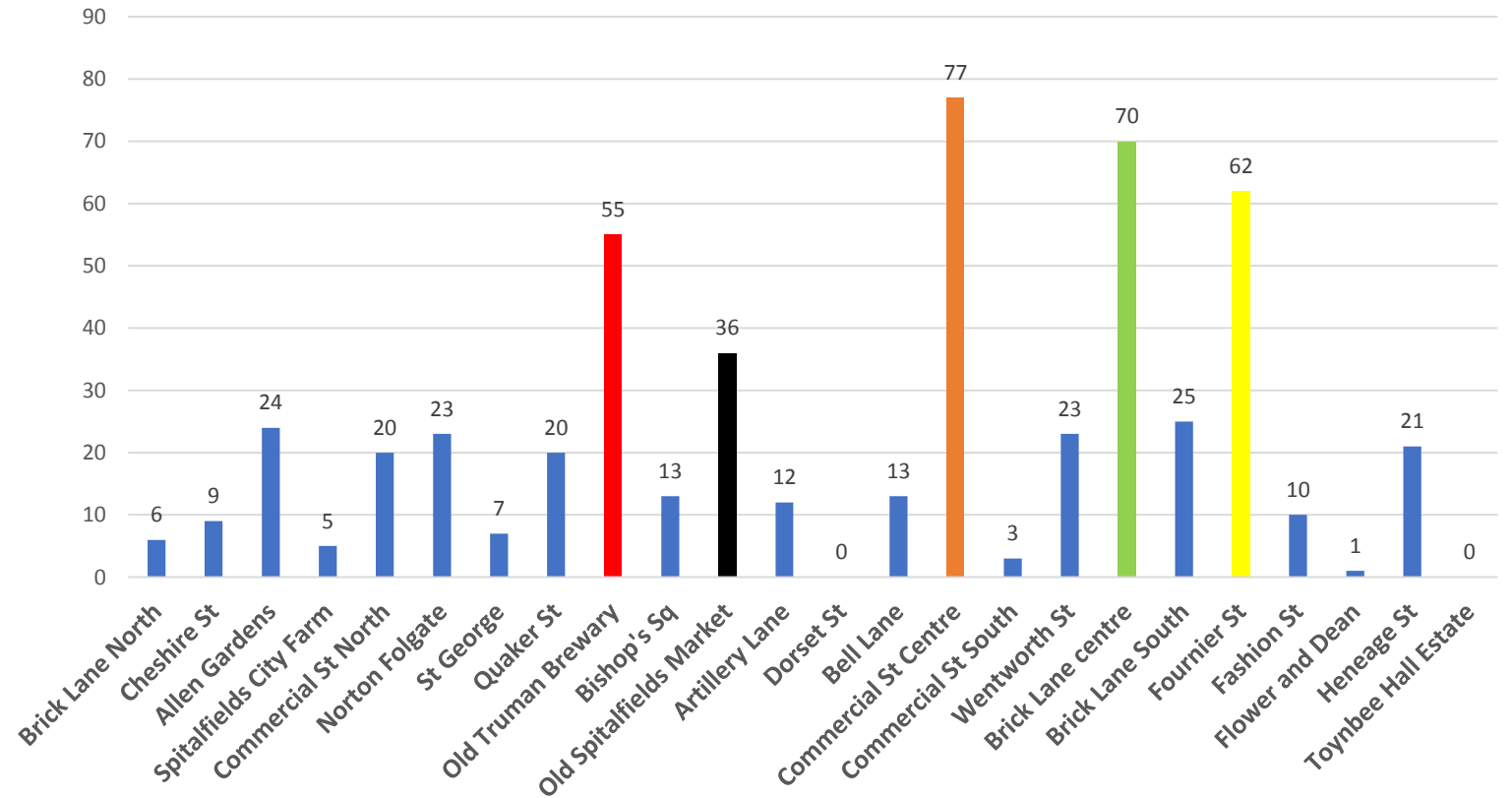


Locations

Top 5 most commented on Locations:

Page 604

- Brick Lane Centre
- Fournier St
- Old Truman Brewery
- Old Spitalfields Market
- Commercial St Centre (including all general comments)



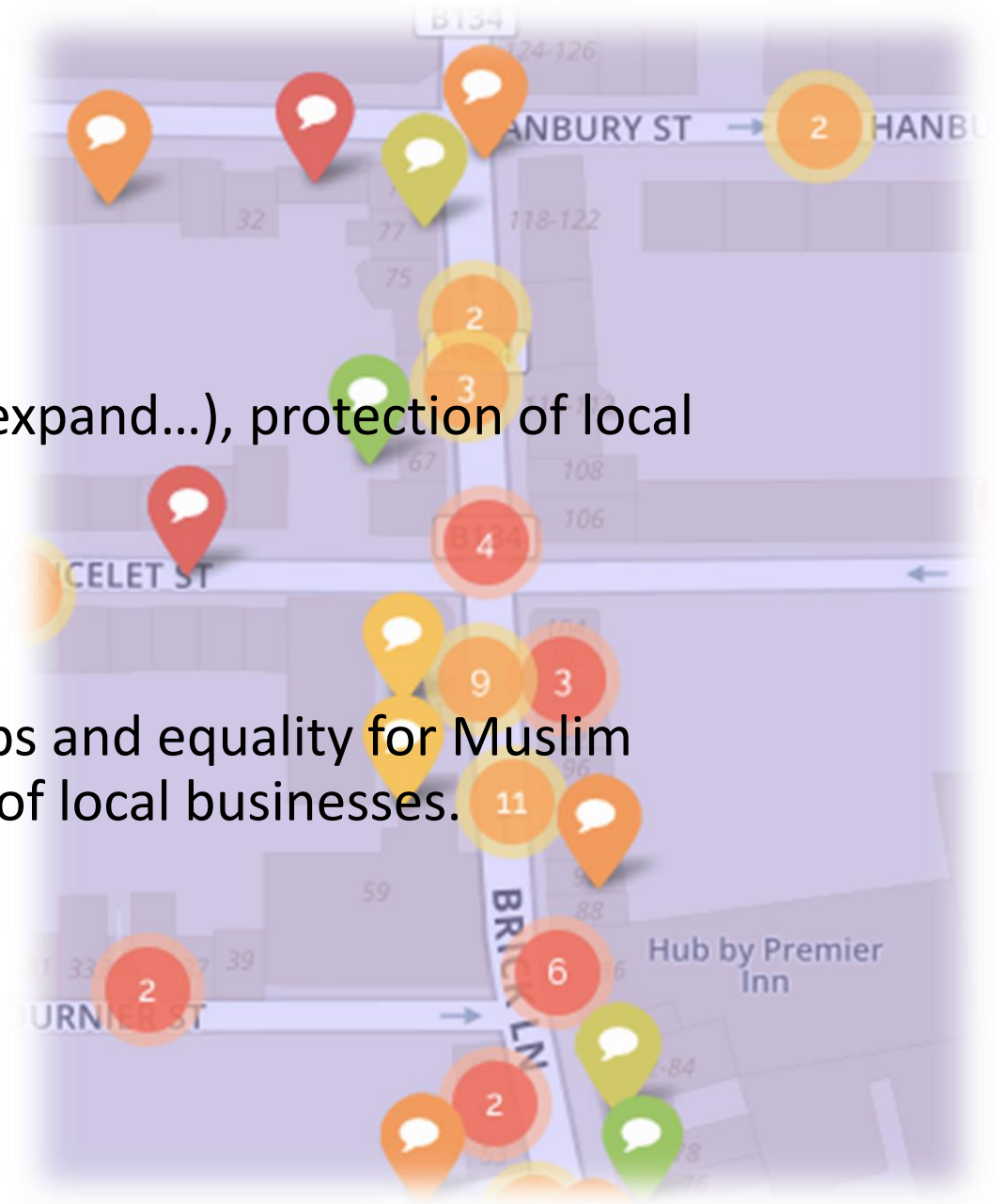
(Numbers in graph refer to the number of comments in each area.)

In general there are more comments on those areas that encompass what could be considered an 'attraction' of the area (e.g. Christ Church, Brick lane market etc).

Brick Lane Centre

- *17 Positive comments:*
 - **Mosque**, school (praise and suggestion they expand...), protection of local businesses.
- *37 Neutral comments:*
 - **Safety** (women and children), open space, jobs and equality for Muslim women, poor housing conditions, protection of local businesses.
- *16 Negative comments:*
 - **Noise**, dirt, housing and overcrowding.

Page 605



Overall Brick lane centre is:

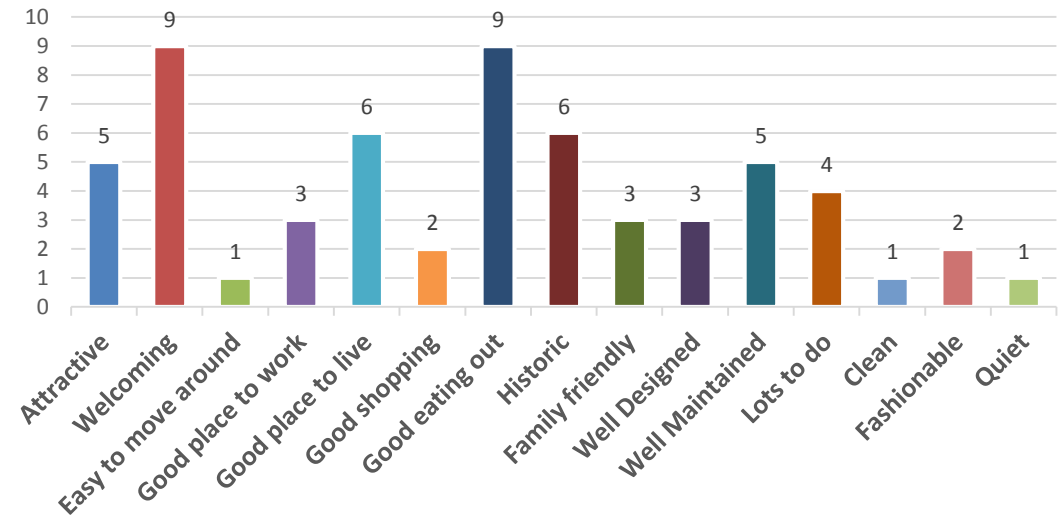
- **Welcoming**
- **Good eating out**
- A good place to live
- Historic

However it is also:

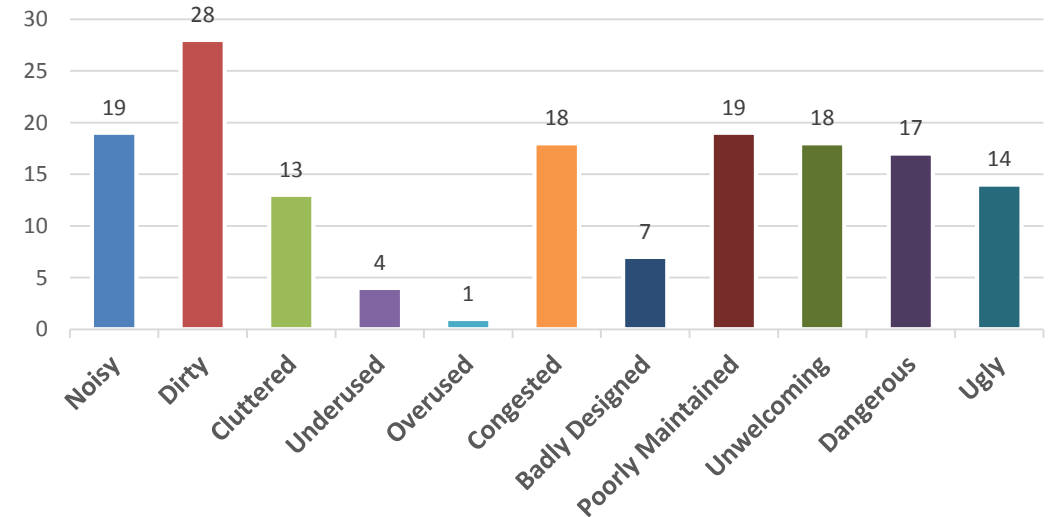
- **Dirty**
- Poorly maintained
- Noisy

(Numbers in graphs refer to number of times these options were selected in this area).

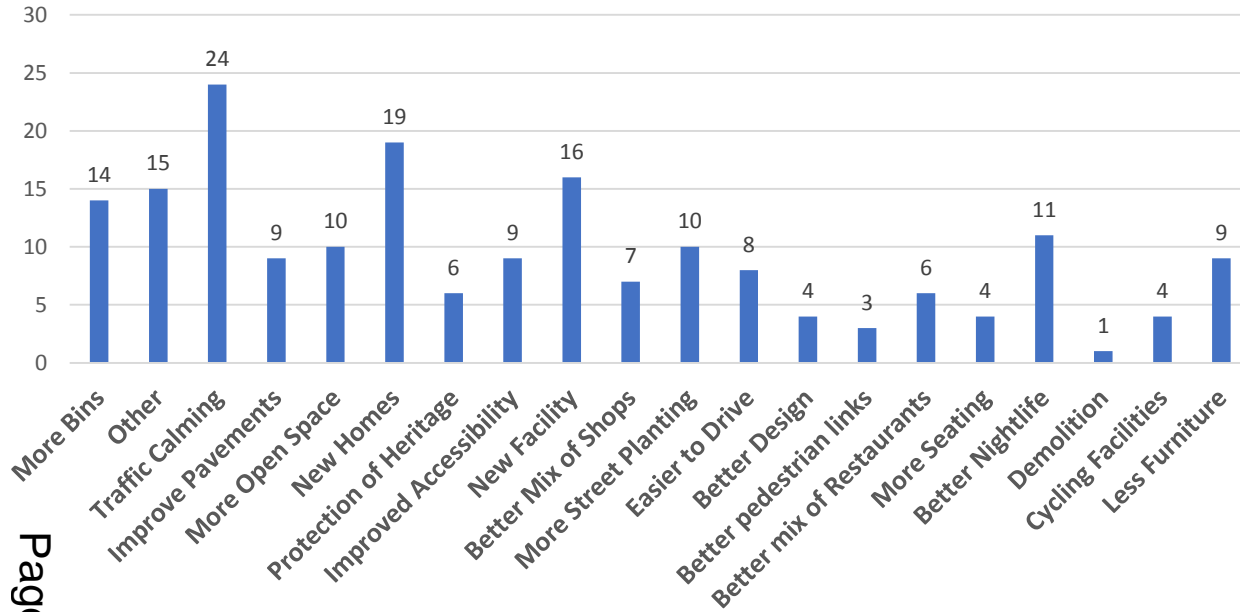
Brick Lane Centre - Positive Codes



Brick Lane Centre - Negative Codes



Brick Lane Centre Improvements



Top Improvements:

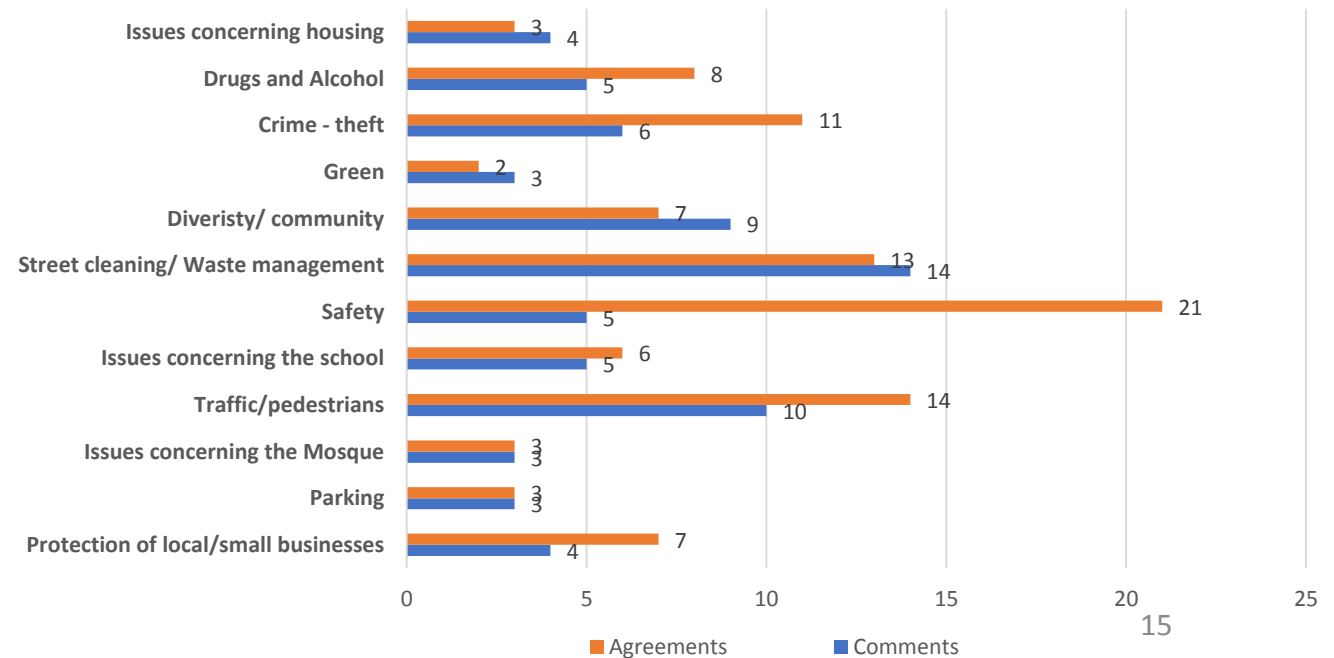
- **Traffic Calming**
- **New Homes**
- **New facility**

Other:

- **Street cleaning**
- **CCTV/ extra police**

(Numbers in graph refer to number times these improvements were selected in this area).

Brick Lane Centre: Keywords by agreements and comments



Keyword agreements show concern over **safety** and **waste** management to be a top priority.

(Numbers in graph refer to the number of times a keyword was agreed with in this area in each relevant comment (orange) and how many comments contained/ referred to this keyword (blue)).

Fournier St

- *16 Positive comments:*

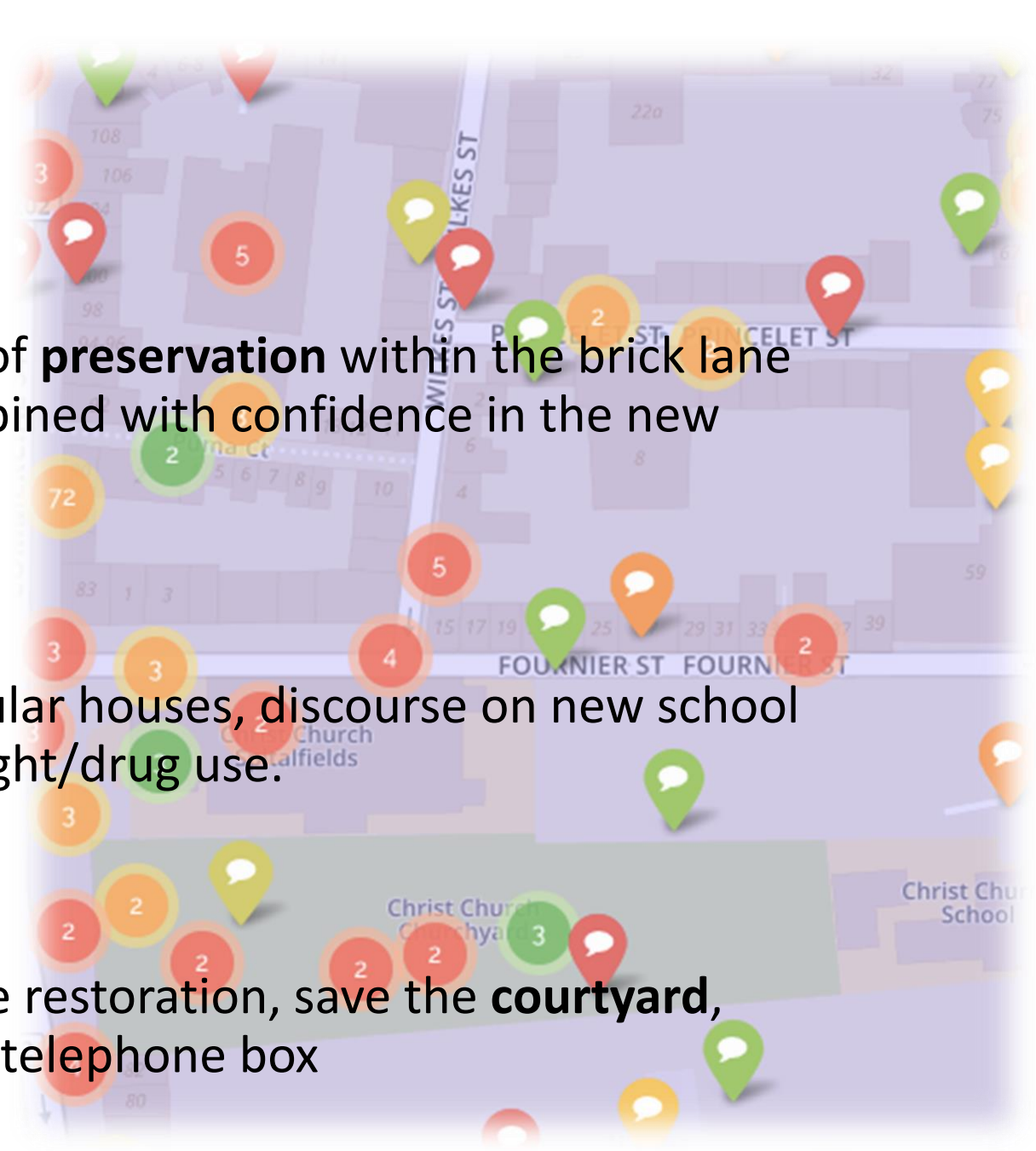
- General praise for the area, suggestions of **preservation** within the brick lane conservation area (restore cobbles) combined with confidence in the new school building.

- *13 Neutral comments:*

- Protection of **heritage** concerning particular houses, discourse on new school building, safety of church courtyard at night/drug use.

- *33 Negative comments:*

- Night **crime**, drugs and dealing, public life restoration, save the **courtyard**, illegal building in church garden, remove telephone box



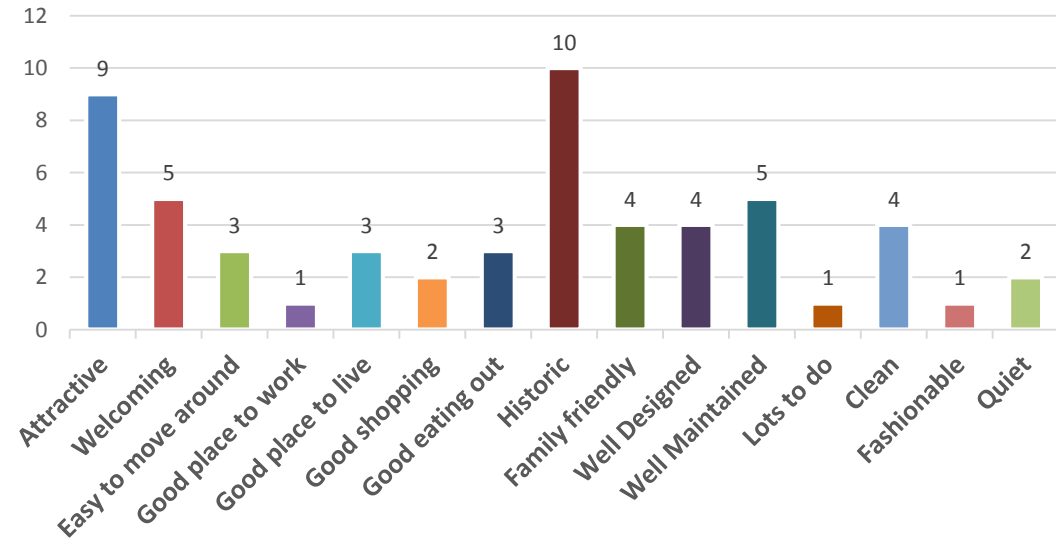
Overall Fournier St is:

- **Historic**
- Attractive
- Welcoming
- Well maintained

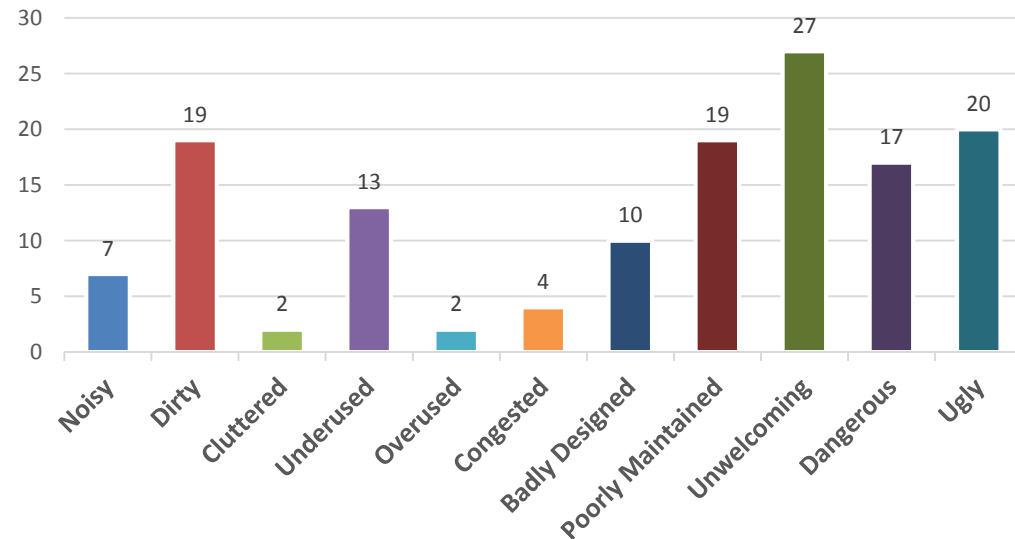
However it is also:

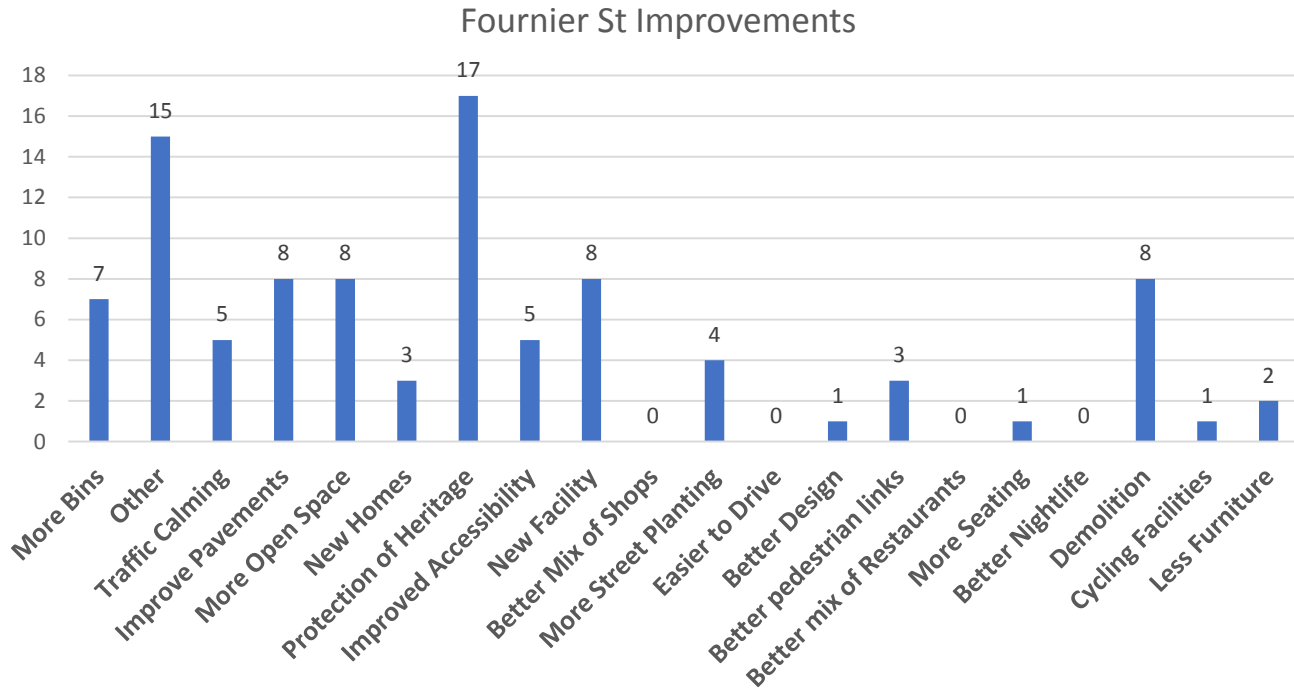
- **Unwelcoming**
- Ugly
- Dirty

Fournier St - Positive Codes



Fournier St - Negative Codes





Top Improvements:

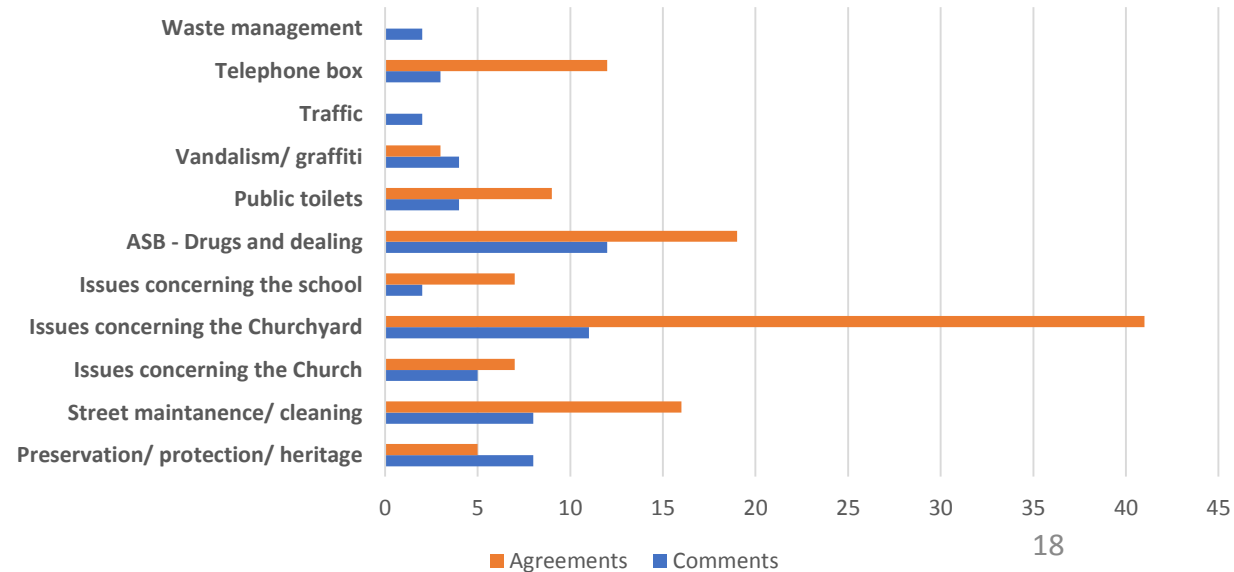
- Protection of heritage
- Improve pavements
- More open space
- New facility
- Demolition

Other:

- Policing/CCTV/ Council action re drugs.
- Remove telephone box

The main issues agreed on are issues concerning the **churchyard** and **antisocial behaviour** (drugs and dealing).

Fournier St - Keyword by comments and agreements



Old Truman Brewery Estate

- *18 Positive comments:*

- Combination of suggestion of potential commercial space and protection of heritage (*Looks like a combination of developers and residents essentially arguing over this space.*)

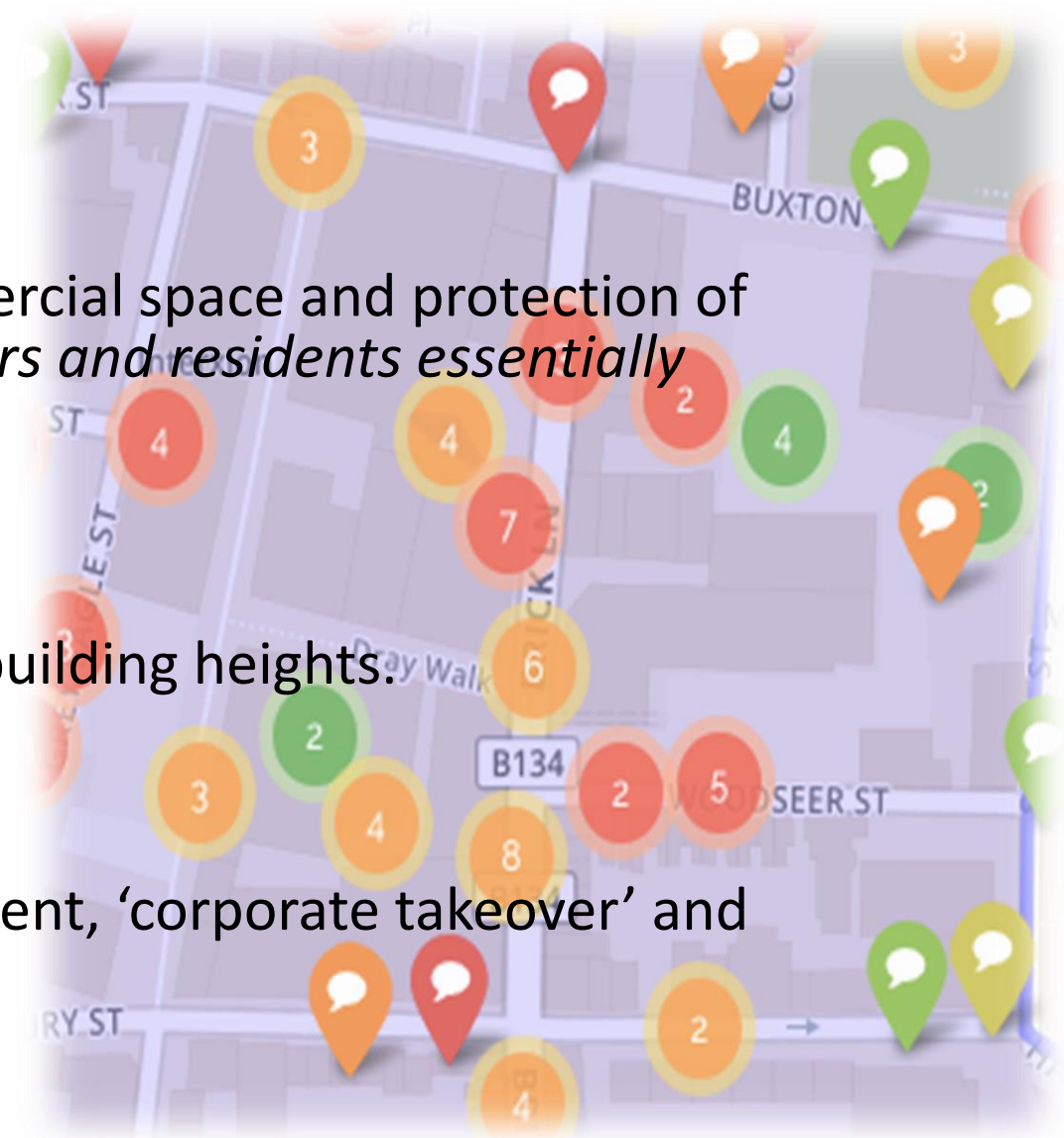
Page 611

- *15 Neutral comments:*

- Similar to above, plus ASB, pedestrian safety, building heights.

- *22 Negative comments:*

- **Parking** and pedestrians, community involvement, ‘corporate takeover’ and ‘diversity going backwards’.



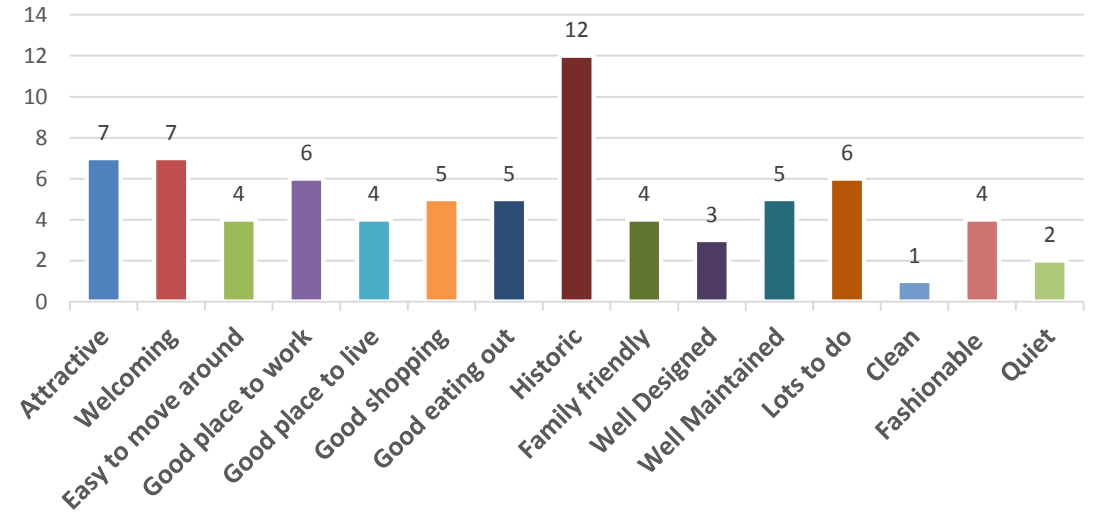
Overall OTB is:

- **Historic**
- Attractive
- Welcoming

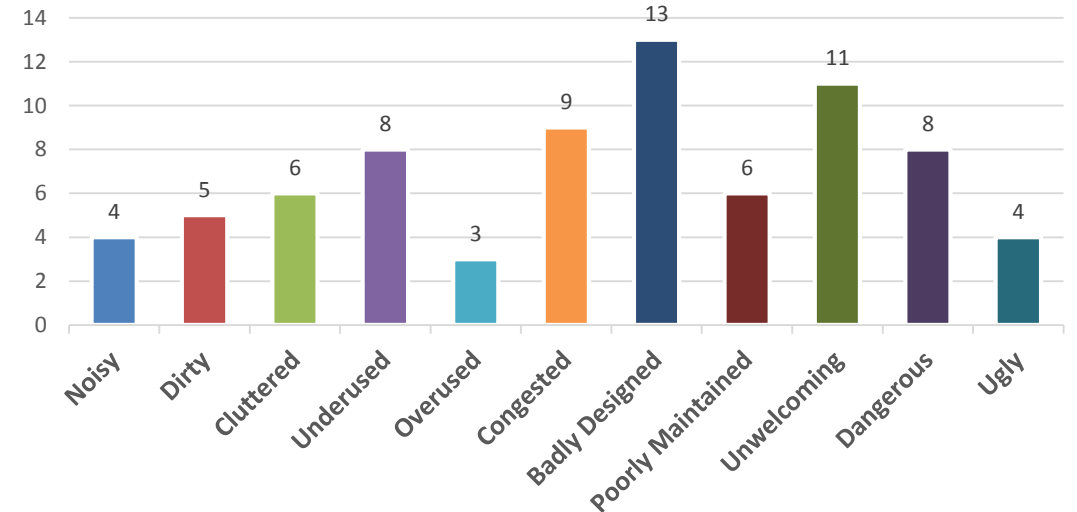
However it is also:

- **Badly designed**
- Unwelcoming
- Congested.

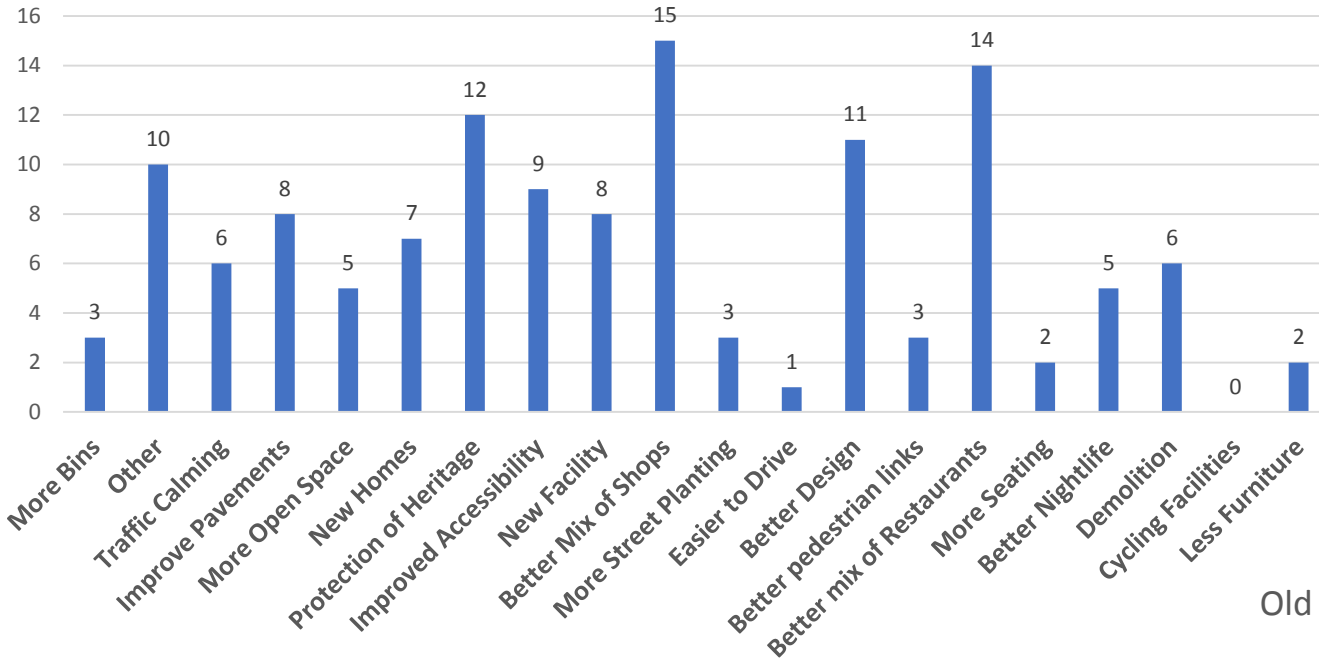
OTB Estate - Positive Codes



OTB Estate - Negative Codes



Old Truman Brewery Improvements



Top Improvements:

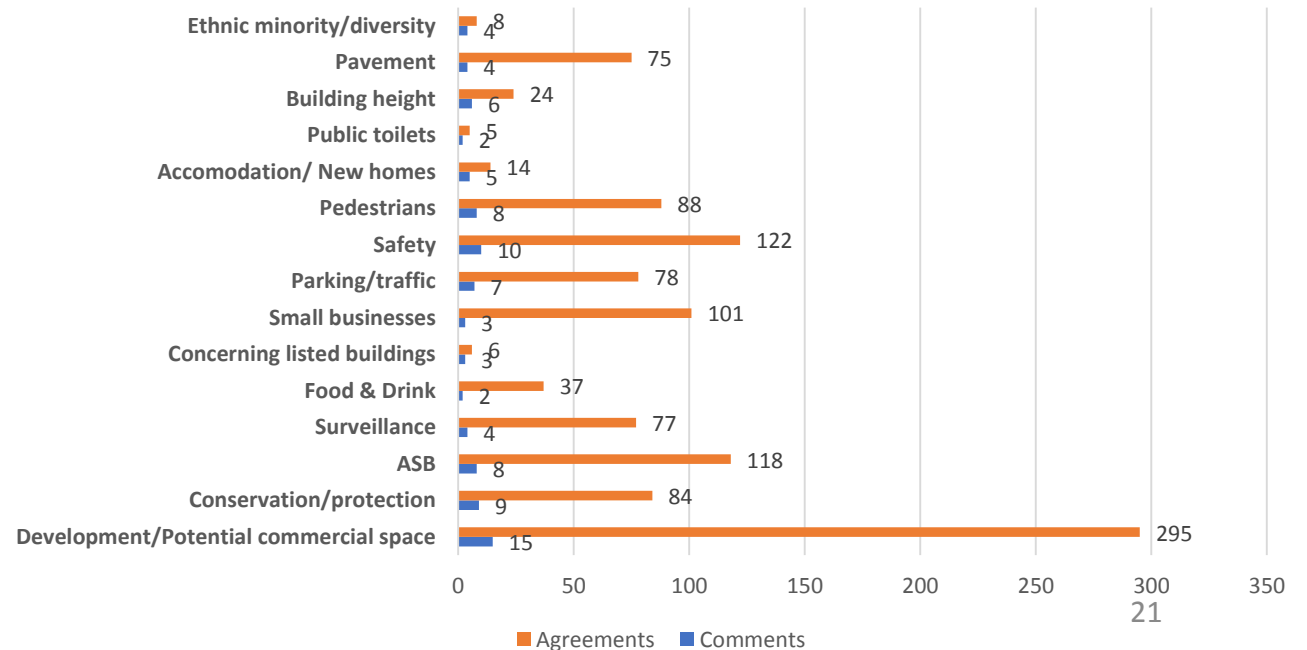
- Better mix of shops
- Better mix of restaurants
- Protection of heritage

Other:

- Listing of building (OTB)
- Pedestrianisation

Main discussion concerned **development** and its potential as a commercial space (and concern to protect it) and **safety** in the area.

Old Truman Brewery: Keywords by comments and agreements



Old Spitalfields Market

- *11 Positive comments:*

- **General** positivity, call for more Islamic involvement and halal restaurants.

Page 614

- *18 Neutral comments:*

- **ASB**, cycling facilities, residential parking, delivery noise disturbing residents, 'stealth conversion of OSM to food venue'.

- *7 Negative comments:*

- Antiques market is not being **preserved** (but should be), ASB, diversity going backwards, aggressive begging.

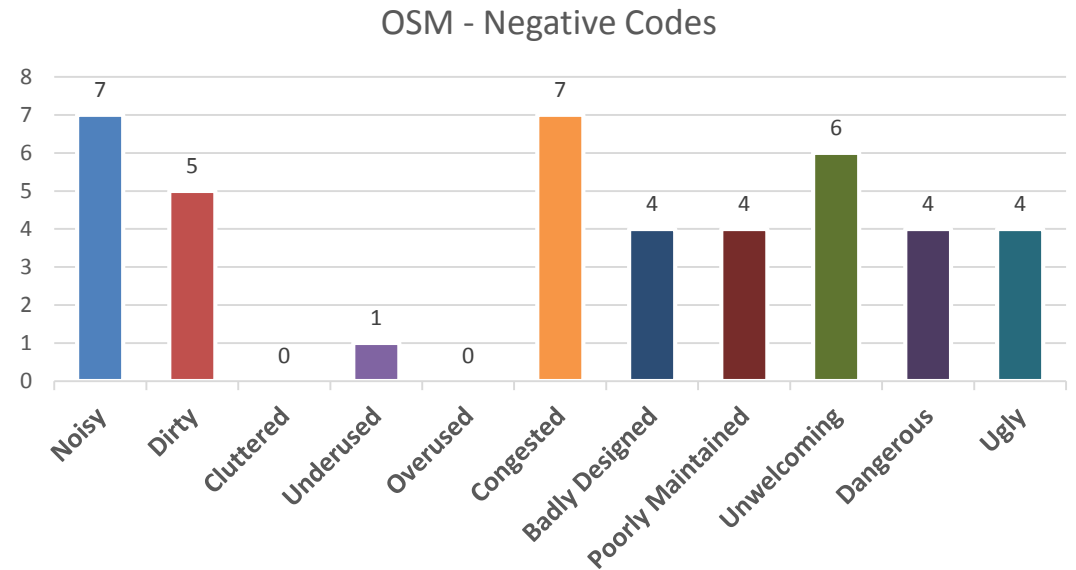
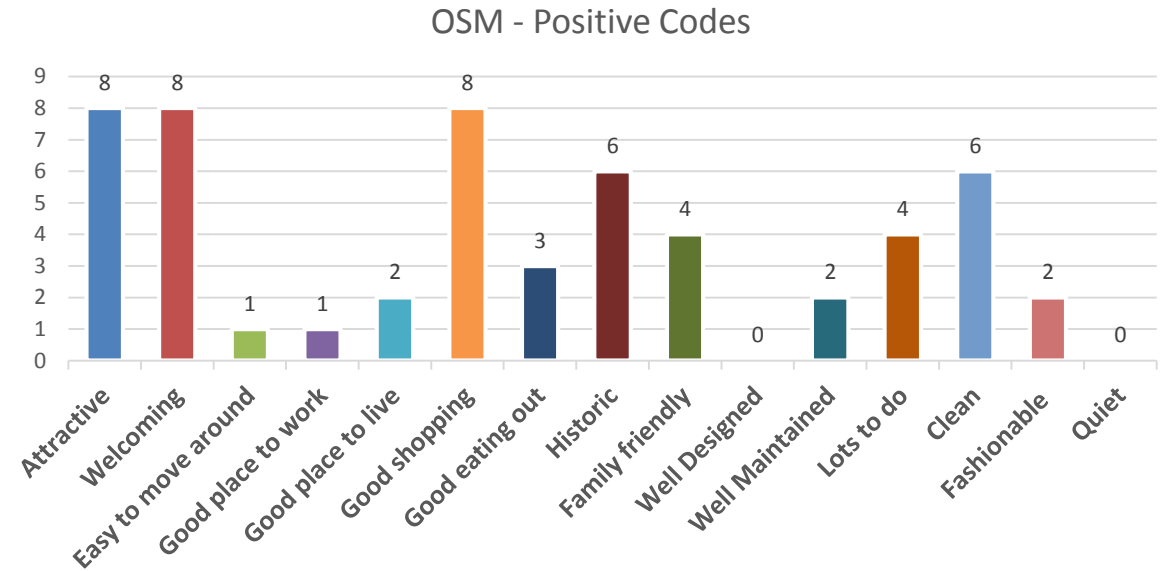


Overall OSM is:

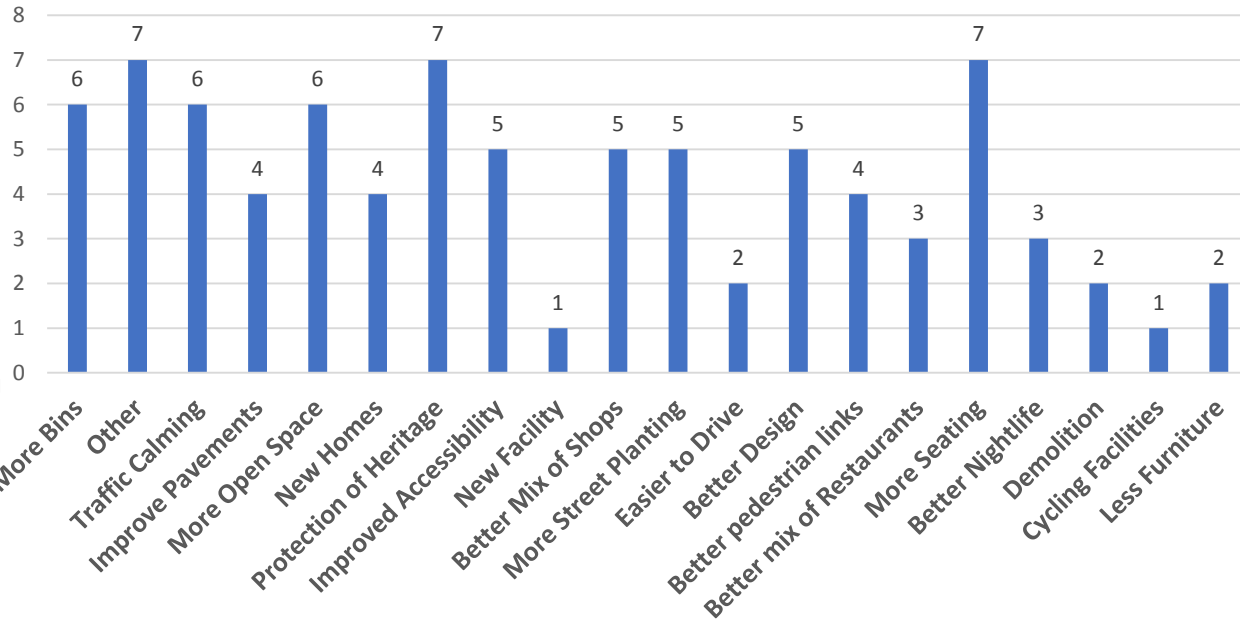
- **Attractive**
- Welcoming
- Good shopping

However it is also:

- **Noisy**
- Congested
- Unwelcoming.



Old Spitalfields Market Improvements



Top improvements:

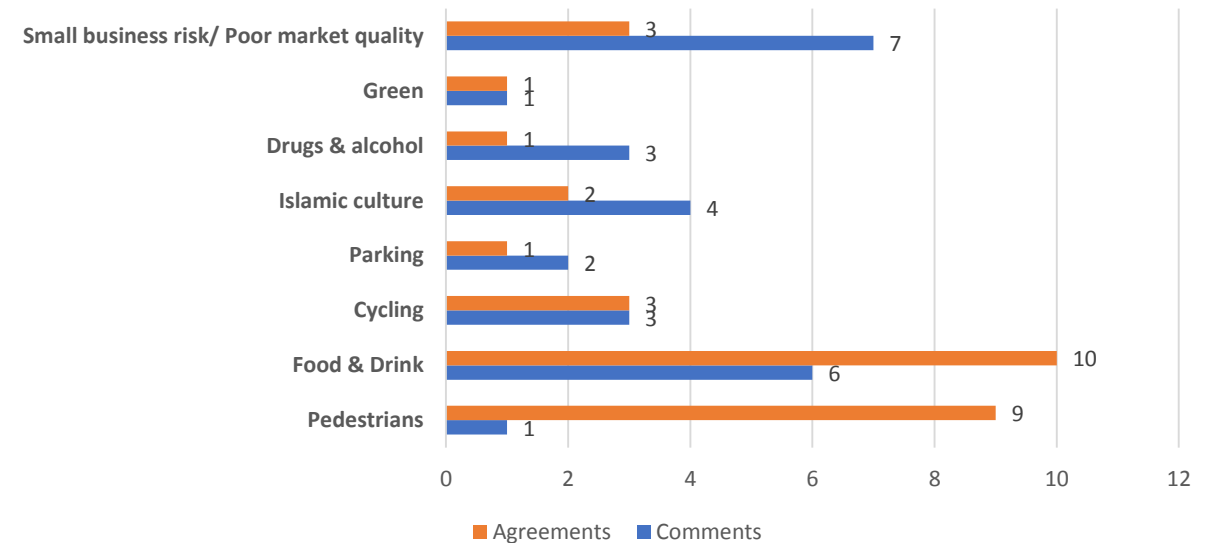
- Protection of heritage
- More seating

Other:

- Parking
- Pedestrianisation

Commenters agree on issues concerning **pedestrians** (safety with cycle lane between Fort St and Crispin St) and **food and drink** (that the market is 'slowly becoming a food venue to make fast money').

Old Spitalfields Market: Keywords by comment and agreements



Spitalfields: General comments

- Separated from Commercial St centre.
- *14 positive comments:*
 - More **public space** and facilities needed, safer cycling routes and a sign showing Spitalfields boundaries.
- *28 neutral comments:*
 - More **affordable housing**, family amenities and public toilets needed. Area dirty and requires more street cleaning.
- *7 negative comments:*
 - Call for a Spitalfields '**regeneration**' – more housing desperately needed, better waste disposal, improved crime management and more urban greenery.
- 21 of these comments left no comment but selected various positive, negative and improvement codes.



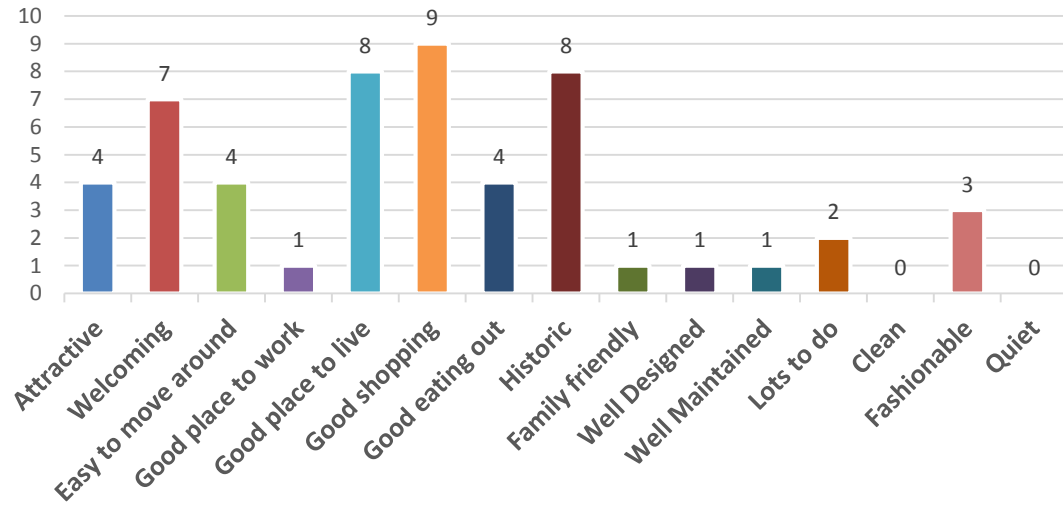
Overall:

- **Dirty**
- congested
- Badly designed.

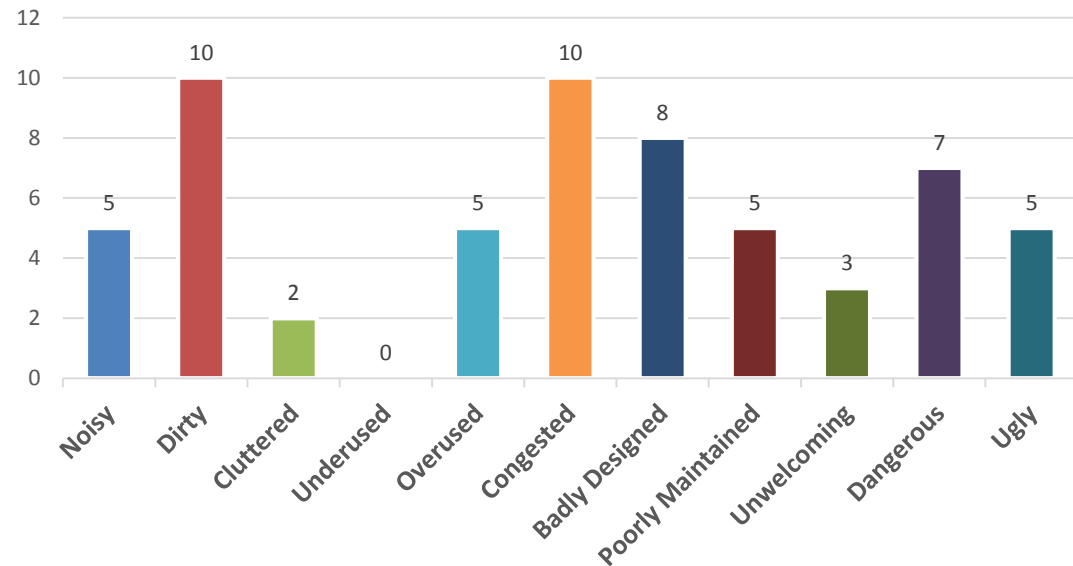
However, also:

- **Good shopping**
- Good place to live
- Historic

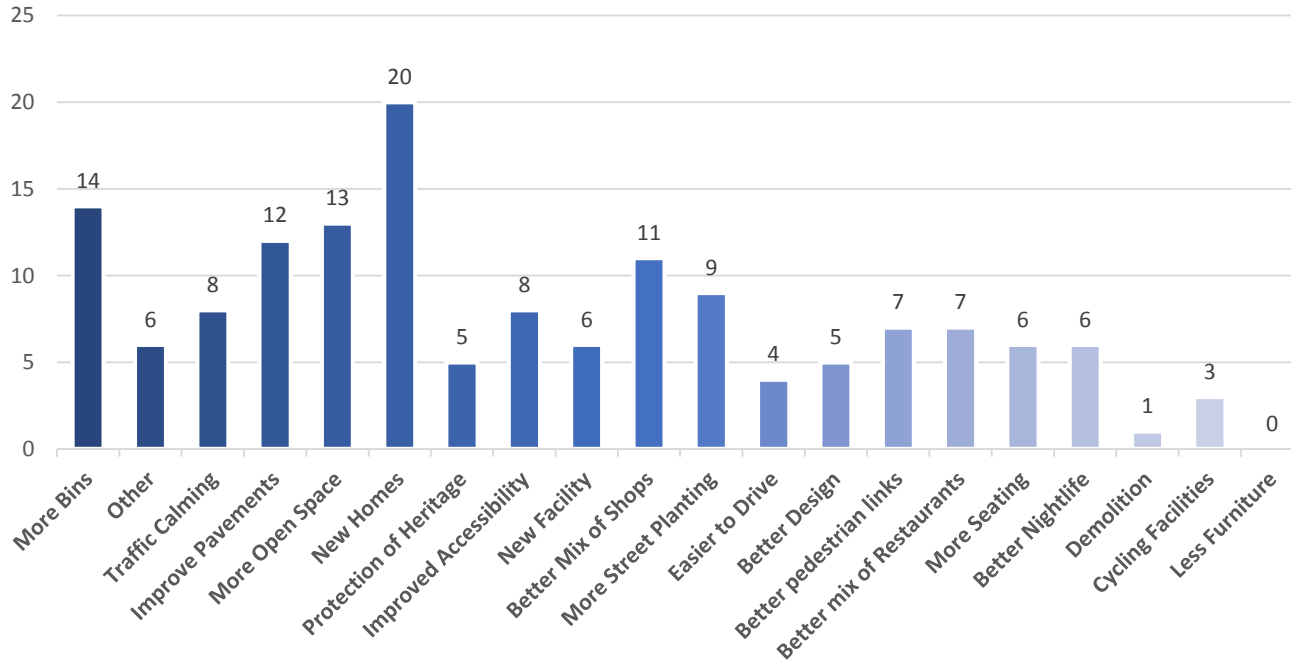
Spitalfields General - positive



Spitalfields General - negative



Spitalfields General - Improvements



Top Improvements:

- New Homes
- More Bins
- More Open space

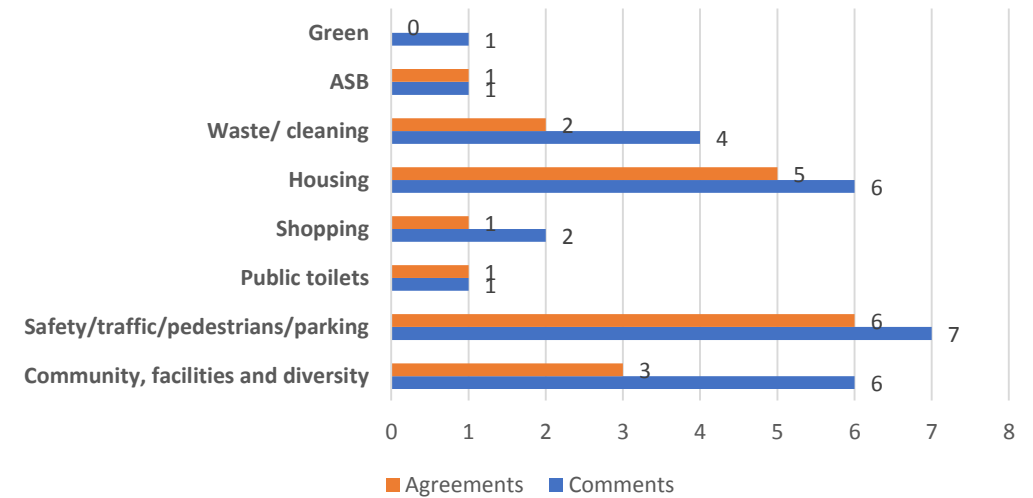
Other:

- Signage
- Street cleaning

Page 619

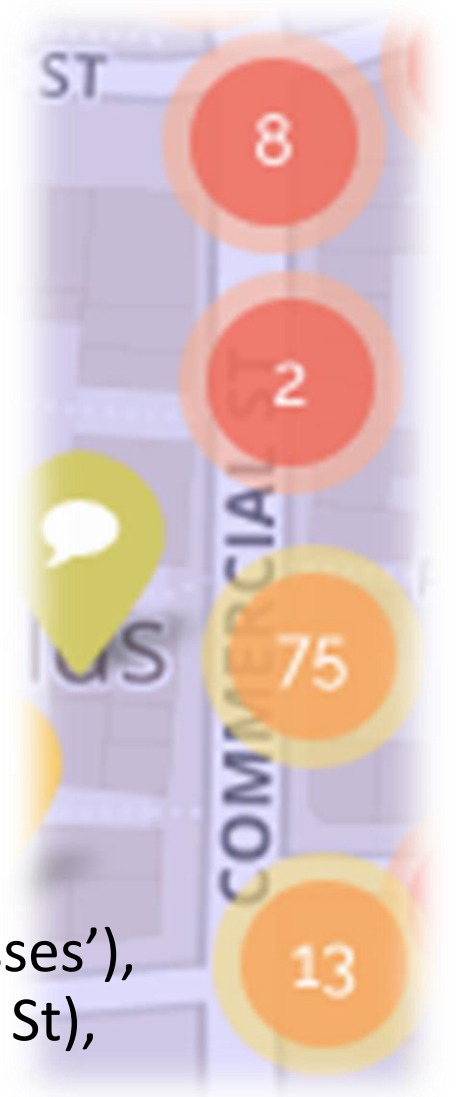
Keyword agreements showed need for more (affordable) housing and better pedestrian and traffic safety.

Spitalfields general: Keywords by comments and agreements.



Commercial St Centre

- Commercial St Centre was used as a focal point for all general comments, therefore they have been split up into two sections.
- *7 Positive comments:*
 - Praise for Eric Elstob's **wisteria**, and protection of **local** businesses.
- *9 Neutral comments:*
 - Street **drinking**, pedestrian safety.
- *12 Negative comments:*
 - General disapproval for **Time Out proposal** ('disaster for local businesses'), dangerous pedestrian crossing (between Commercial/Hanbury/Lamb St), Waste from Poppies and St John's.



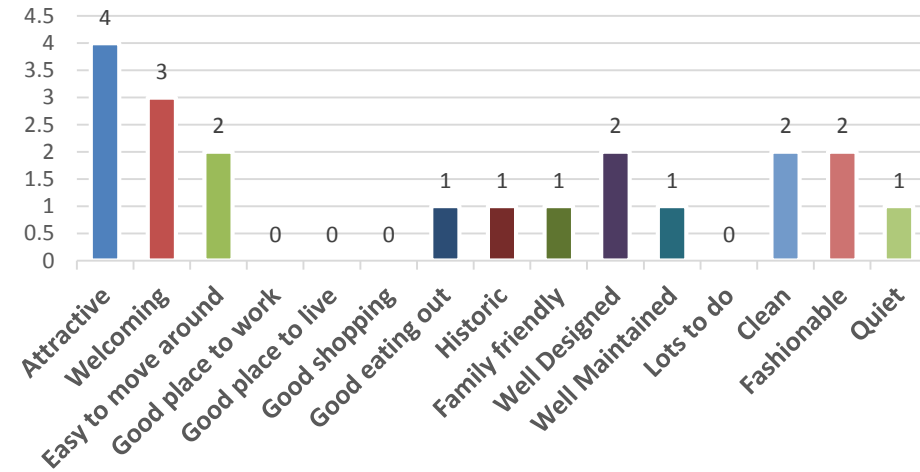
Overall:

- **Attractive**
- **Welcoming**

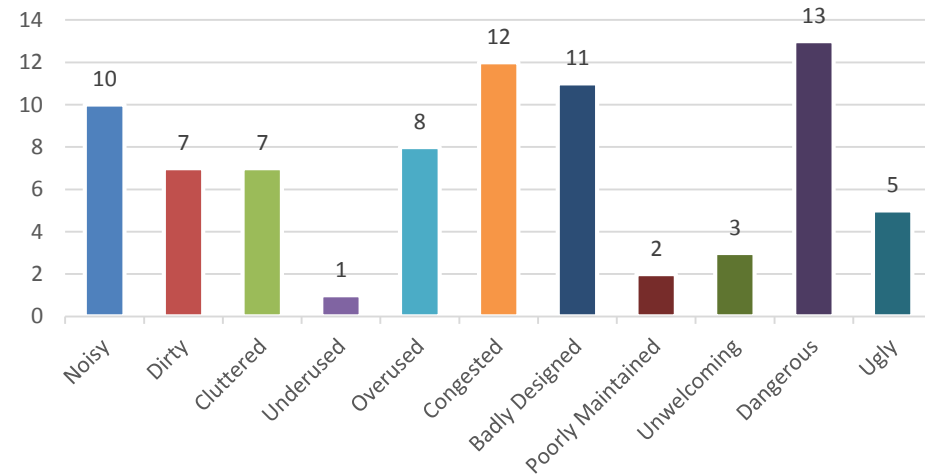
However also:

- **Dangerous**
- **Congested**
- **Badly designed**

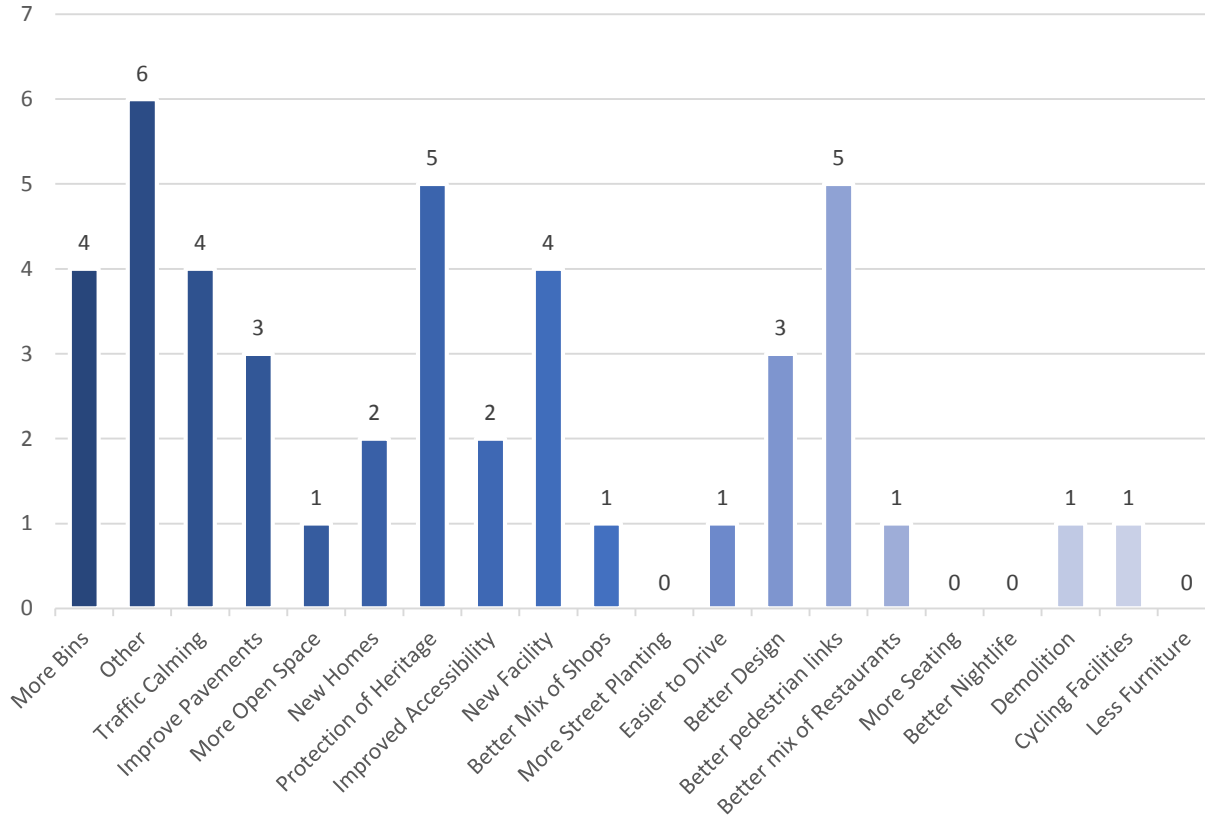
Commercial St Centre - Positive



Commercial St Centre - Negative



Commercial St Centre - Improvements



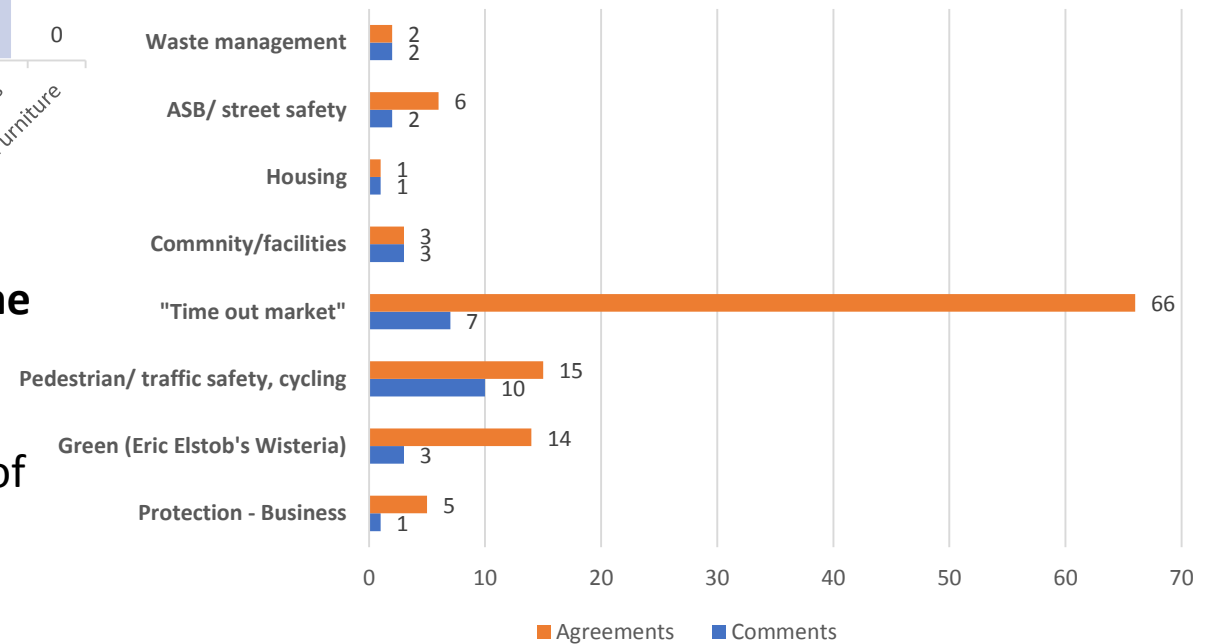
Top improvements:

- Protection of heritage
- Better pedestrian links
- Traffic calming/ more bins/ new facility.

Agreements show overwhelming support **against** potential **time out market**.

Analysis shows that although one comment alone, in support of the time out market, had 39 agreements, far higher than a majority of all comments in the report. However, a further 6 separate comments contended this suggestion.

Commercial St Centre: Keywords by comment and agreement



Summary of all other areas:

Location

Key Issues

Brick Lane North

Parking, Sunday market waste

Cheshire St

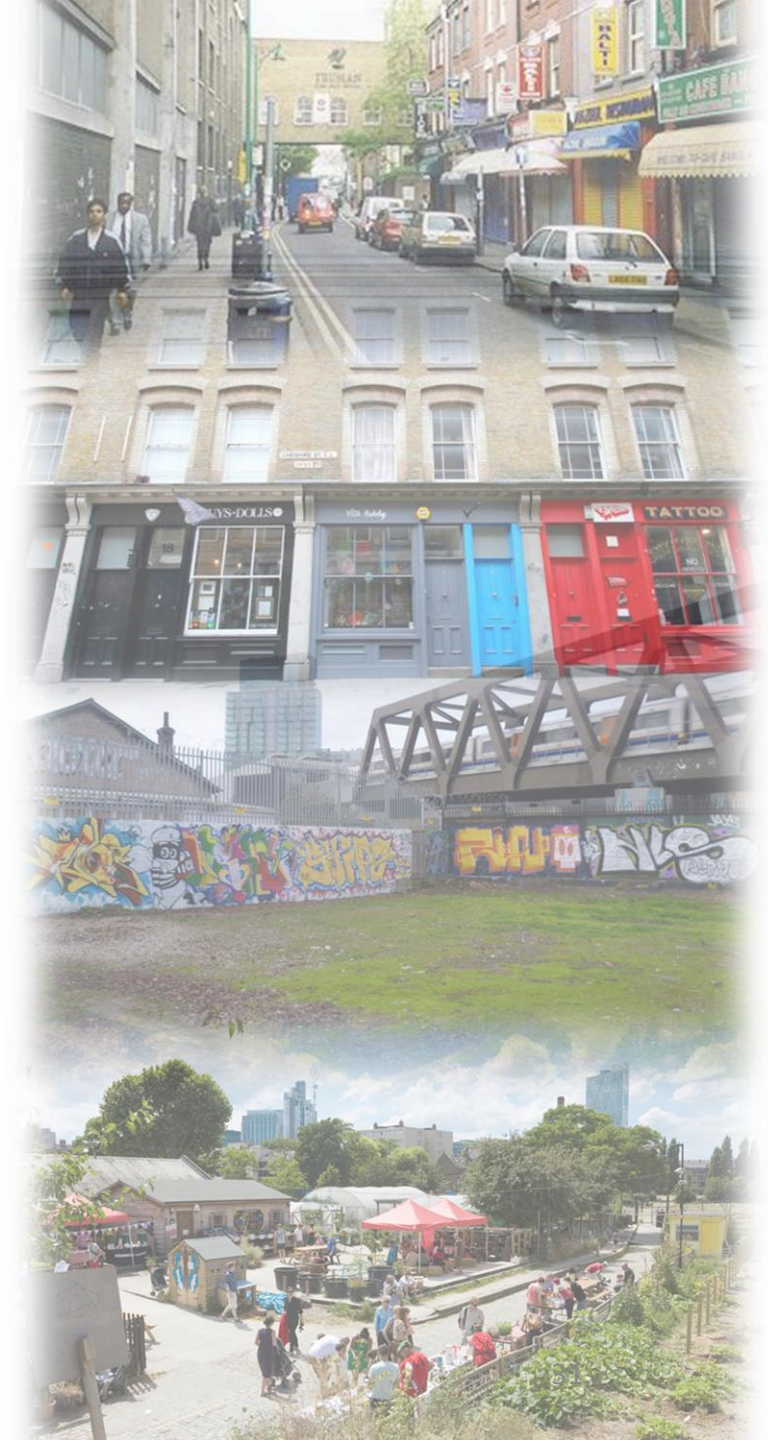
Drugs, traffic safety, pavements for wheelchairs

Allen Gardens

Green space, bins and litter, playground safety, drugs, stop astro-turf plans.

Spitalfields City Farm

Give more land to farm, entrance from Allen gardens, ASB



Location

Key Issues

Commercial St North

Dangerous crossing, bus shelter needs seating, community building should be put to use, deliveries.

Norton Folgate

Redevelopment opportunity for green space, protection of warehouses, wildlife and tree protection, dislike for tall new building on Bishopsgate.

St George

Threatening surrounding development, cycling: separate cyclists and pedestrians.

Quaker St

Uneven pavements, homelessness, area caters to drug users, derelict buildings and privately owned garden underused.



Location

Key Issues

Bishop's Square

Change lighting and drainage system of market, alcohol licensing and noise of bar in Bishop's sq.

Artillery Lane

Mixed bag: needs livening up, businesses should open to give an 'east end feel', possible nightclub location, underused but needs protection and residential parking needed, unmanageable waste produced.

Dorset St

No comments.

Bell Lane

Protection needed for Duke of Wellington PH, general neglect of this area, litter/waste management needed, drugs and ASB an issue.



Location

Key Issues

Commercial St South

Abandoned/dilapidated shops need protection, Wentworth St. alleyway needs waste management/cleaning.

Wentworth St

Unsafe traffic, ineffective dead end signs. Plan needed to save market and identity, proper waste disposal after market needed, unsafe parking by traders.

Brick Lane South

Need for visible police patrols, street cleaning, lighting in alleyway next to Thrawl St, ban customer soliciting, damp housing, police management of drug usage and ASB.



Page 626

Location

Key Issues

Fashion St

Too few pedestrian crossings, street surface unmanageable for push chair users.

Flower and Dean

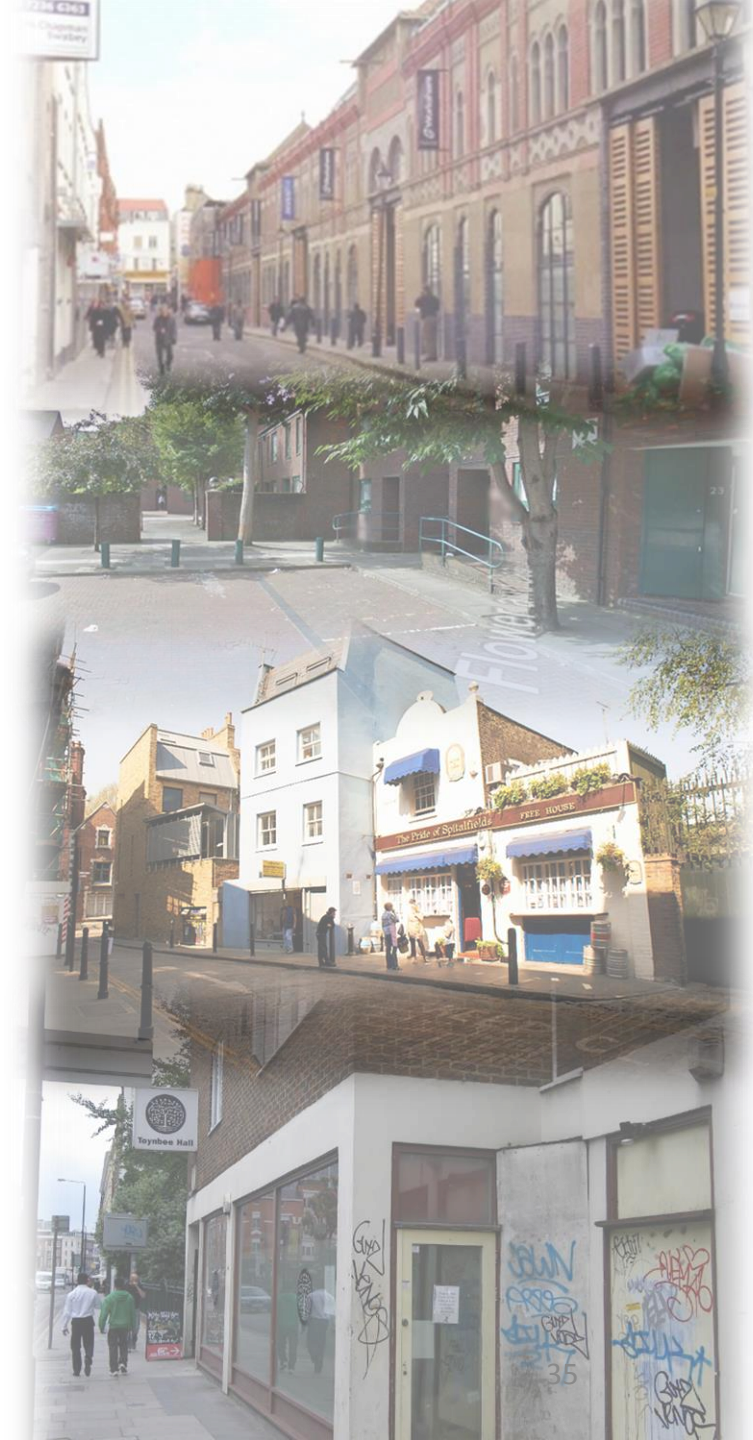
‘House fronts too similar and bland’.

Heeneage St

Water feature and gym equipment not maintained, keep area identity, council housing needed, encouragement for younger generation to start businesses, pavements and wheelchair/pushchair users, drugs and ASB a problem.

Toynbee Hall St

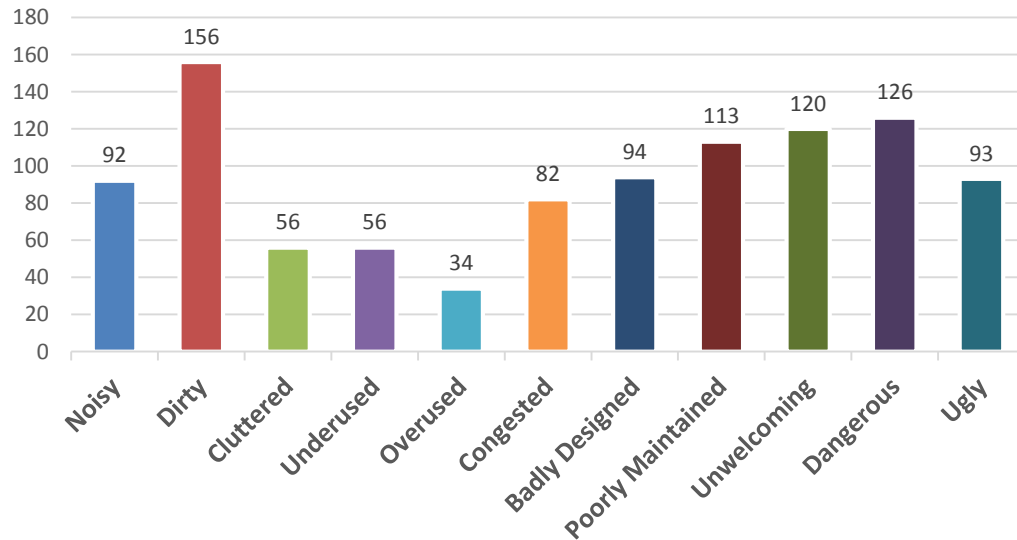
No comments.



Responses to the question: Why do you feel this way?

Page 628

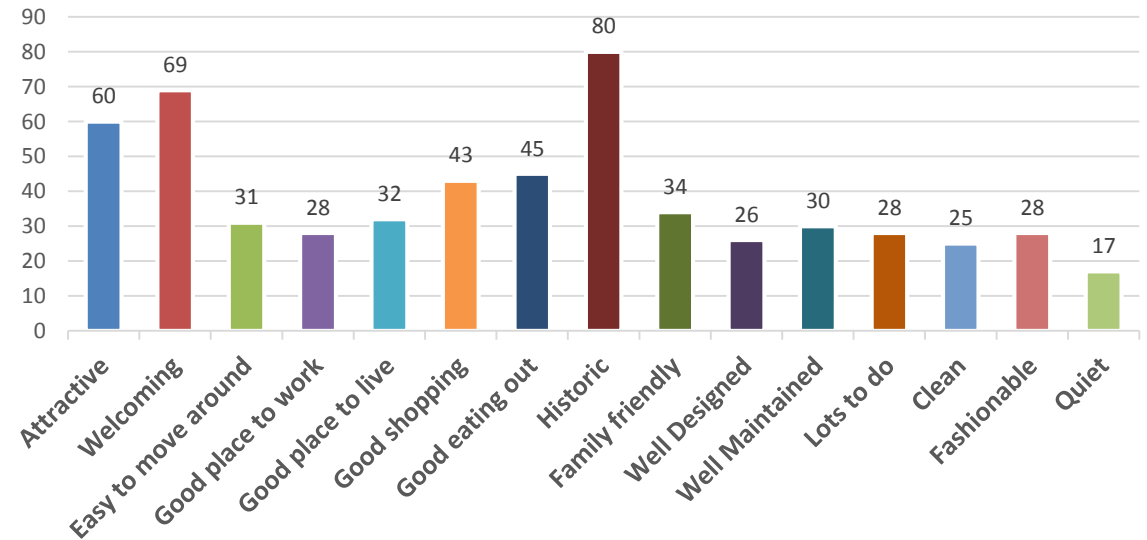
Total negative codes



Dirty, dangerous and unwelcoming.

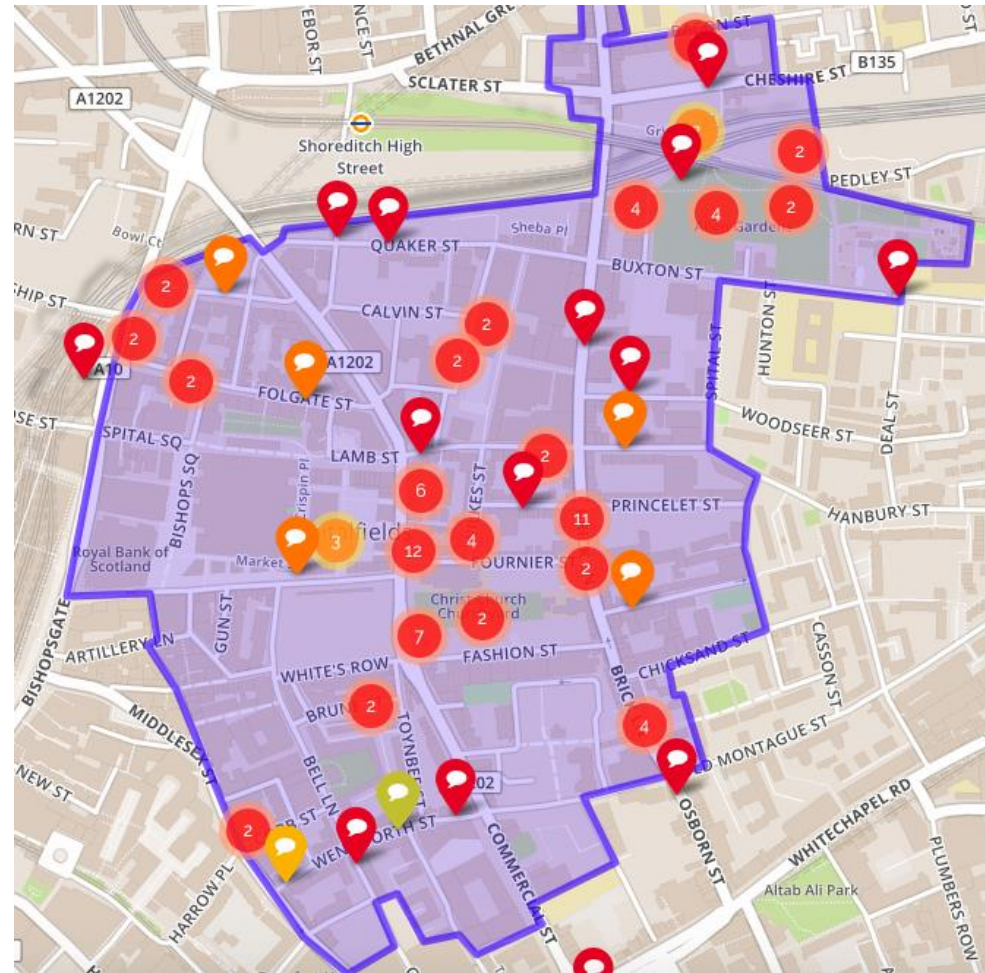
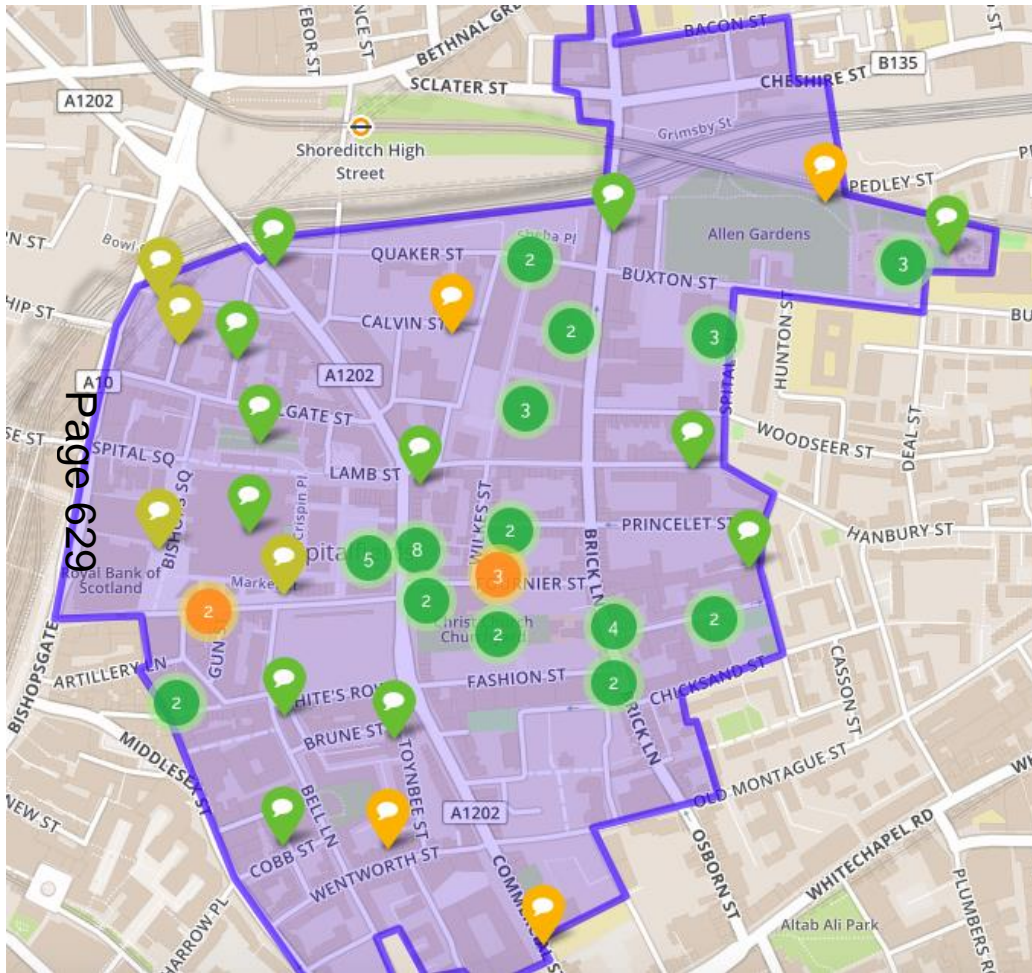
Historic, welcoming and attractive.

Total positive codes



Tags based on location: Attractive / Ugly

Top 3 areas for each response indicated. Where there are contrasting opinions for one place (e.g. here in Fournier St) these will refer to different areas of the segment. *Worth also remembering that this also depends on how many comments overall were left in each area.*



Attractive:

- Fournier St
- Old Spitalfields market
- Old Truman Brewery

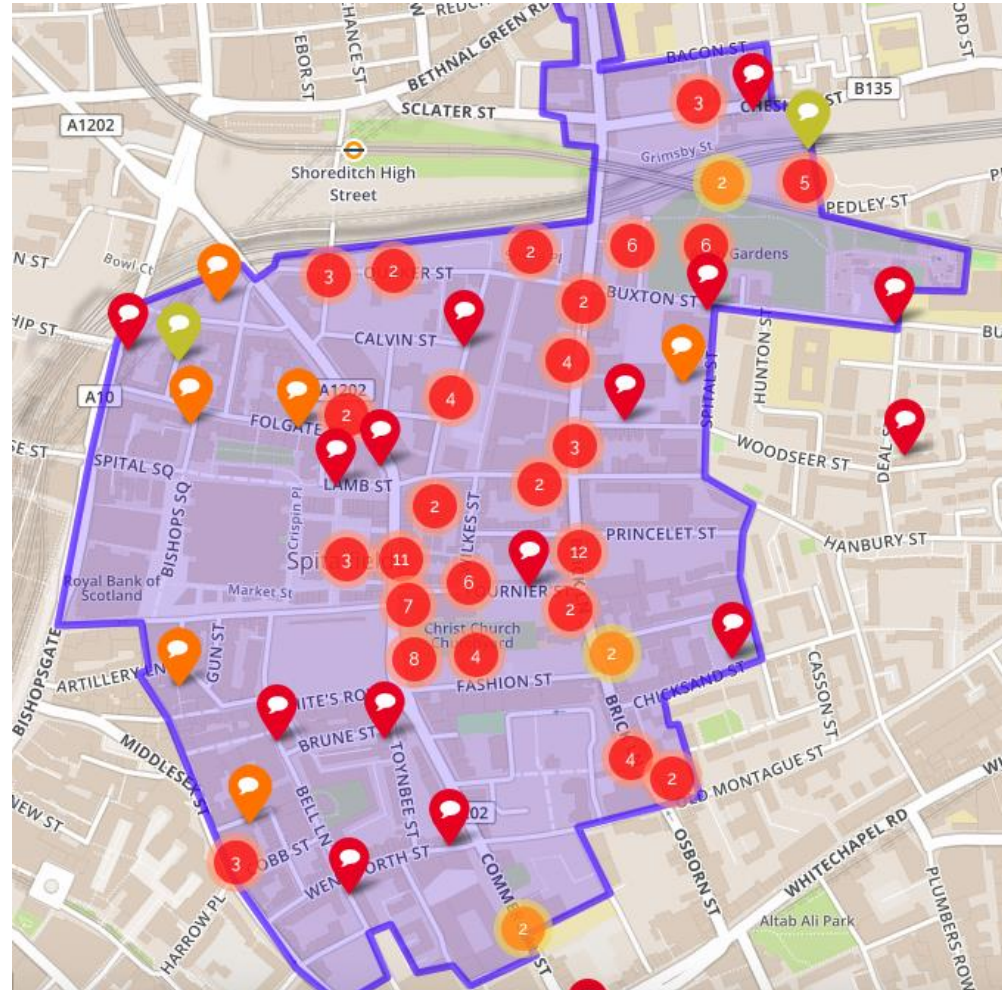
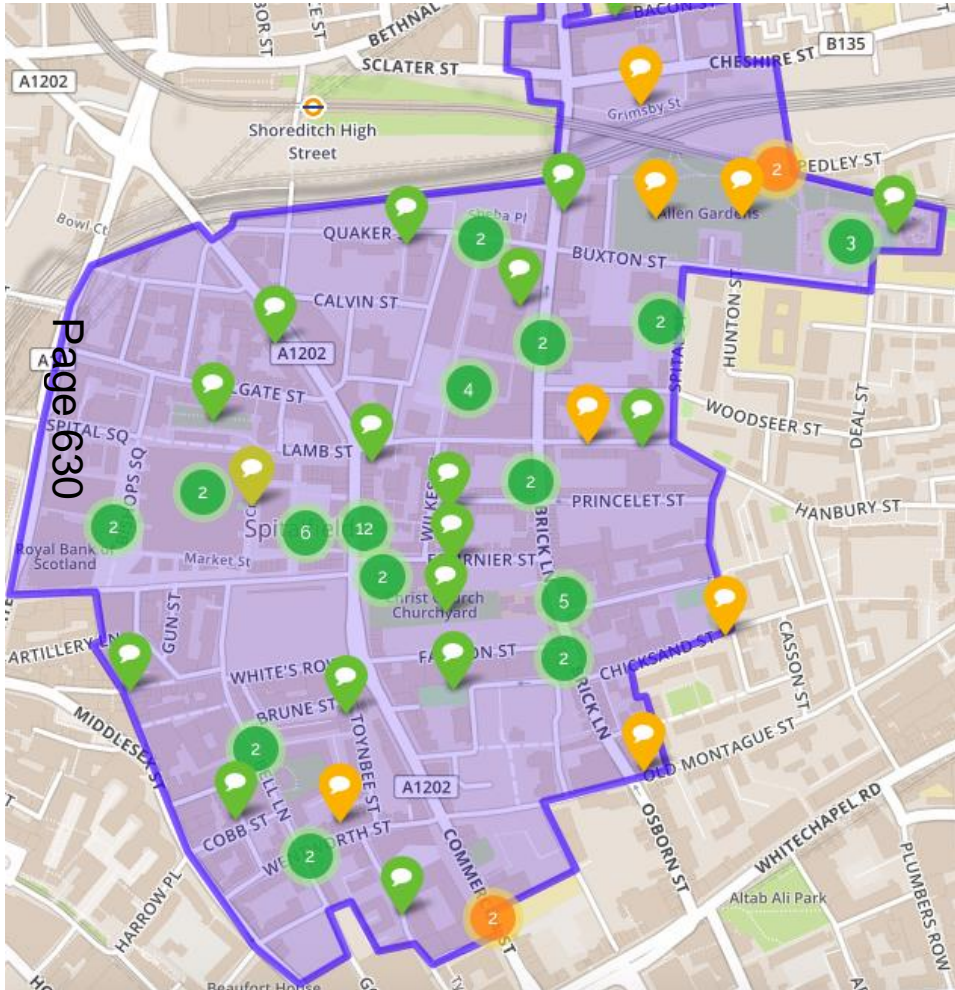
Ugly:

- Fournier St
- Brick Lane Centre
- Norton Folgate

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Attractive%22>

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Ugly%22>

Welcoming / Unwelcoming



Welcoming:

- Brick Lane Centre
- Old Spitalfields market
- Old Truman Brewery

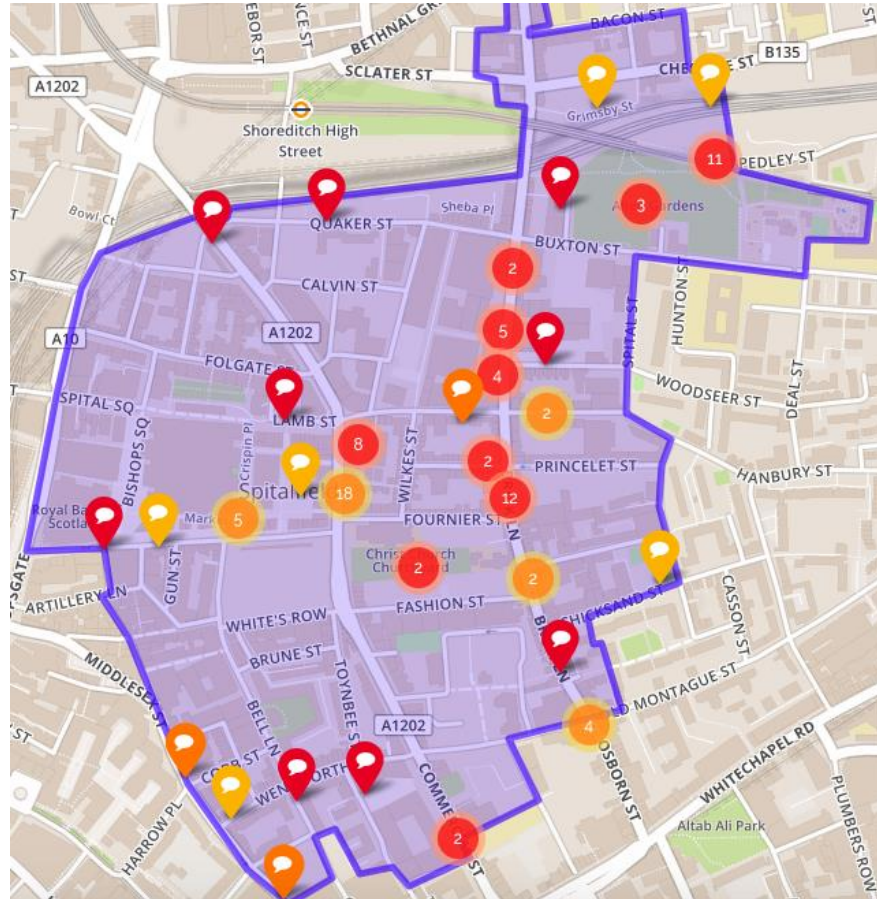
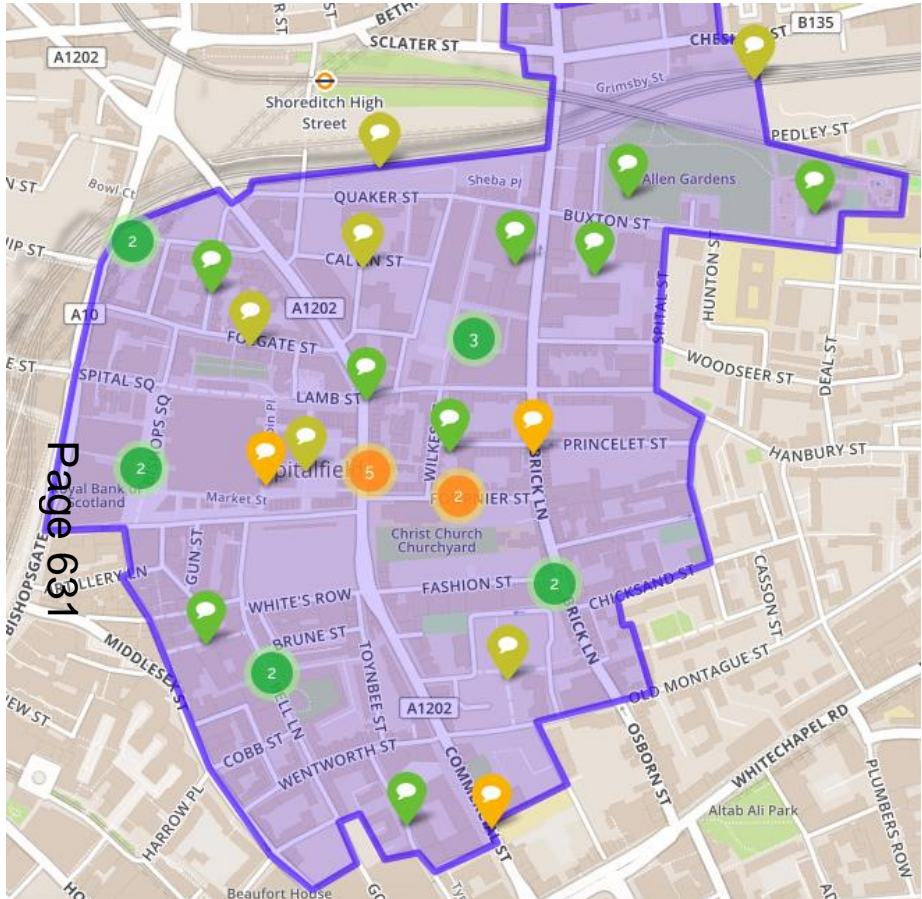
Unwelcoming:

- Fournier St
- Brick Lane Centre
- Old Truman Brewery

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Welcoming%22>

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Unwelcoming%22>

Easy to move around / Congested



Easy to move around:

- Old Truman Brewery
- Bishop's Square
- Fournier St

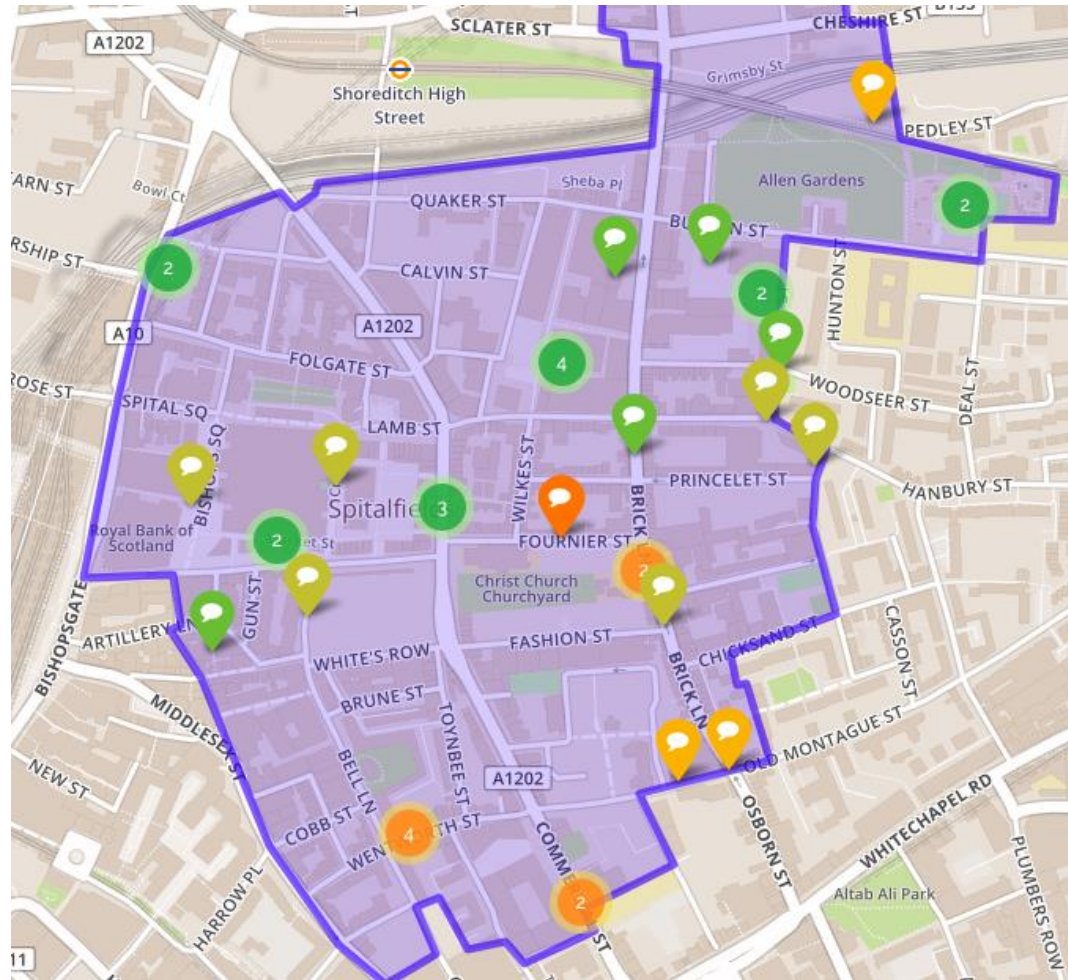
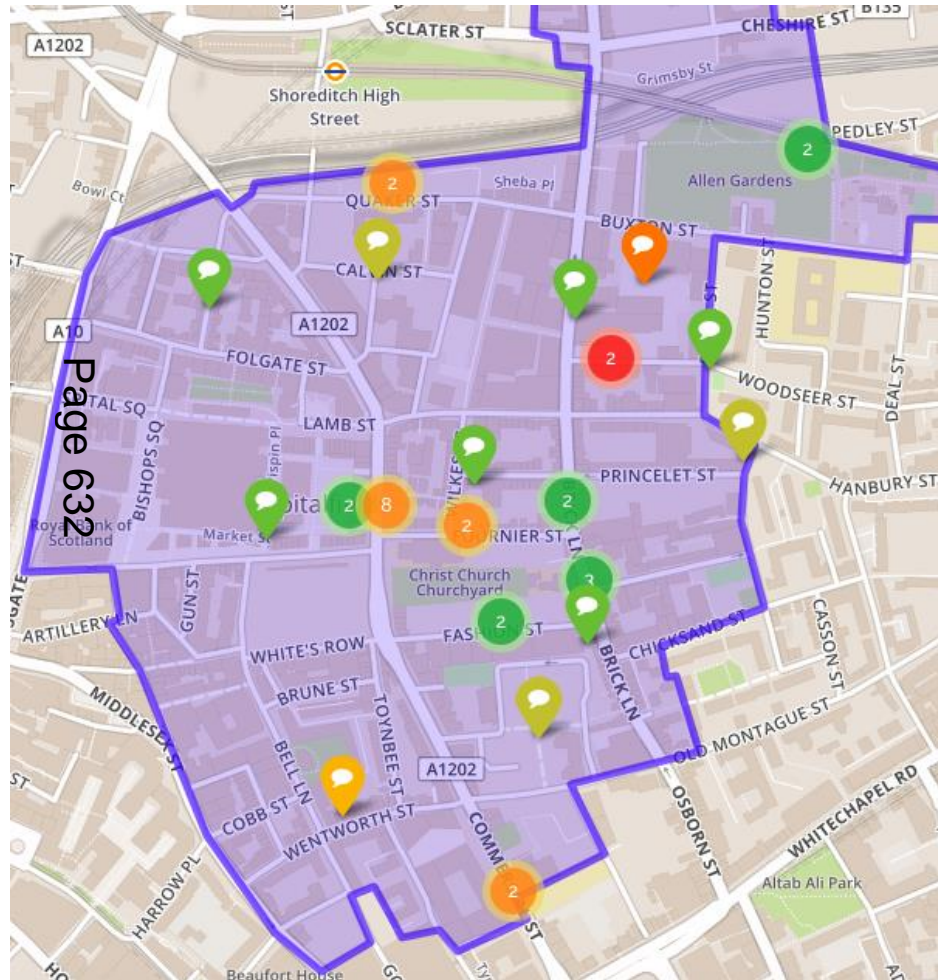
Congested:

- Brick Lane Centre
- Commercial St Centre
- Old Truman Brewery

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Easy%20to%20move%around%22>

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Congested%22>

Good place to live / Good place to work



Good Place to live:

- Brick Lane Centre
- Old Truman Brewery
- Fournier St

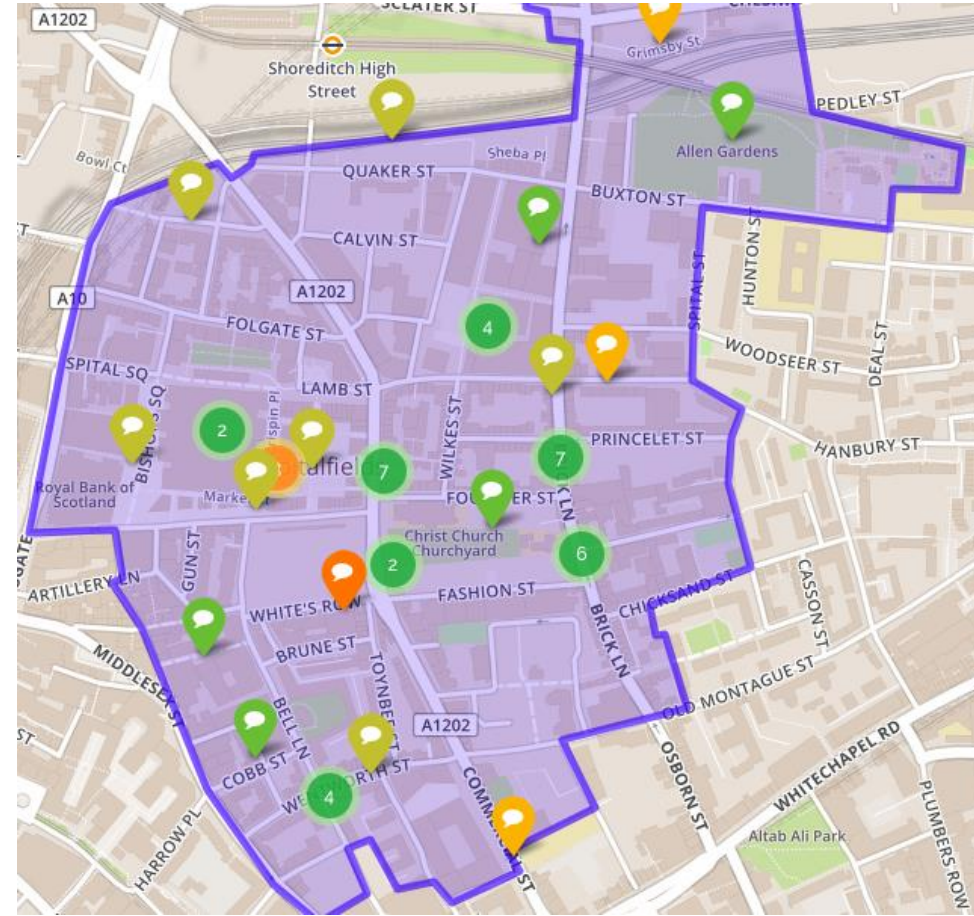
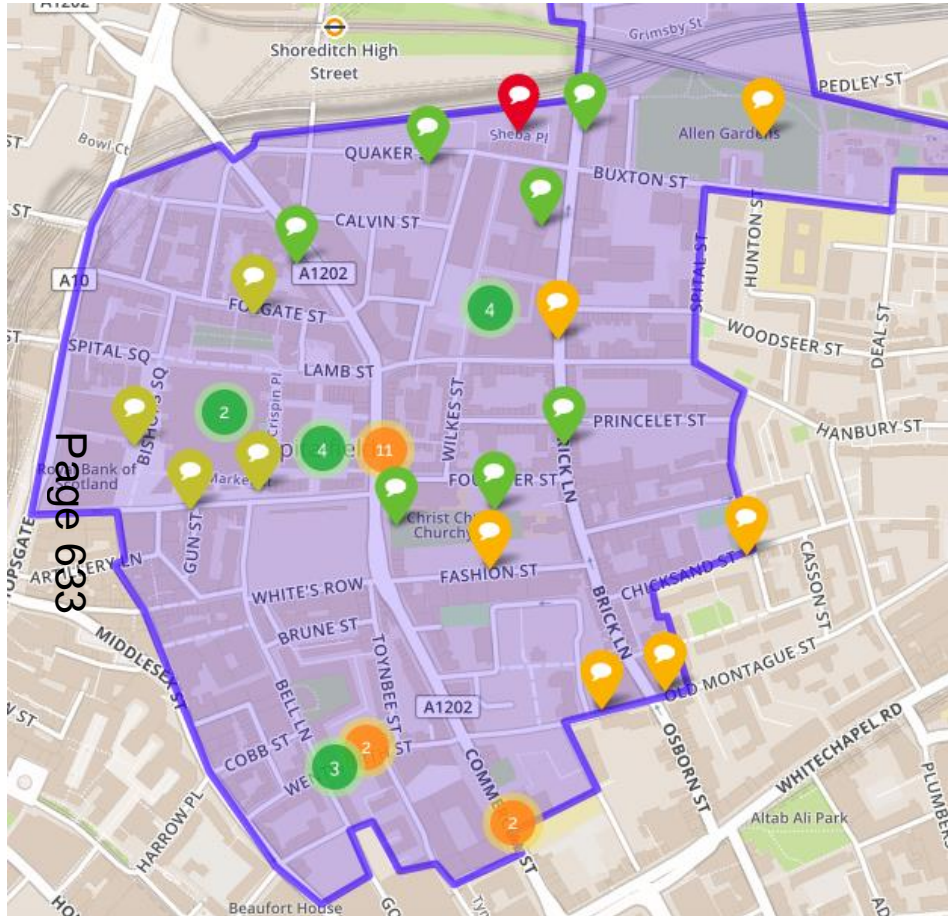
Good place to work:

- Old Truman Brewery
- Wentworth St

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Good%20place%20to%live%22>

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Good%20place%20to%work%22>

Good shopping / Good eating out



Good Shopping:

- Old Spitalfields market
- Wentworth St
- Old Truman Brewery

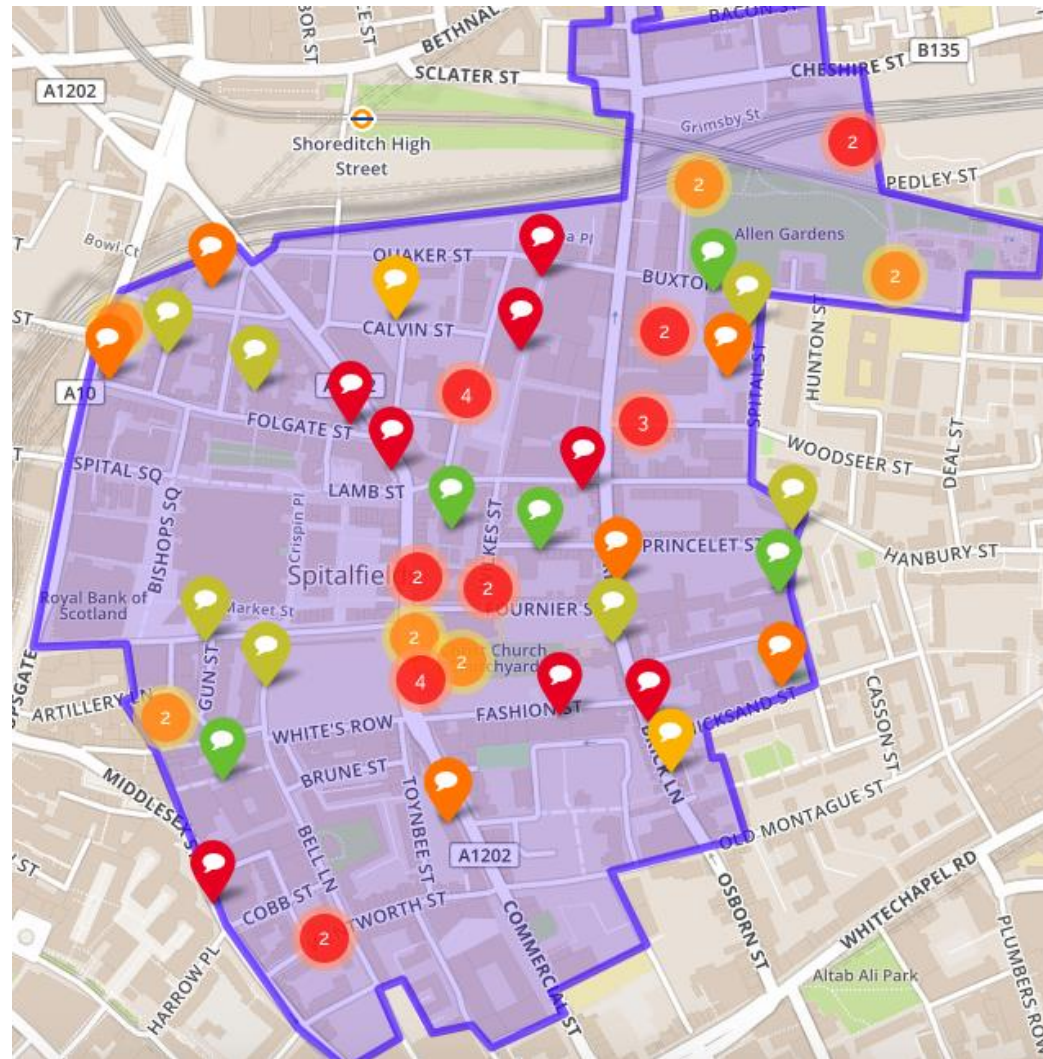
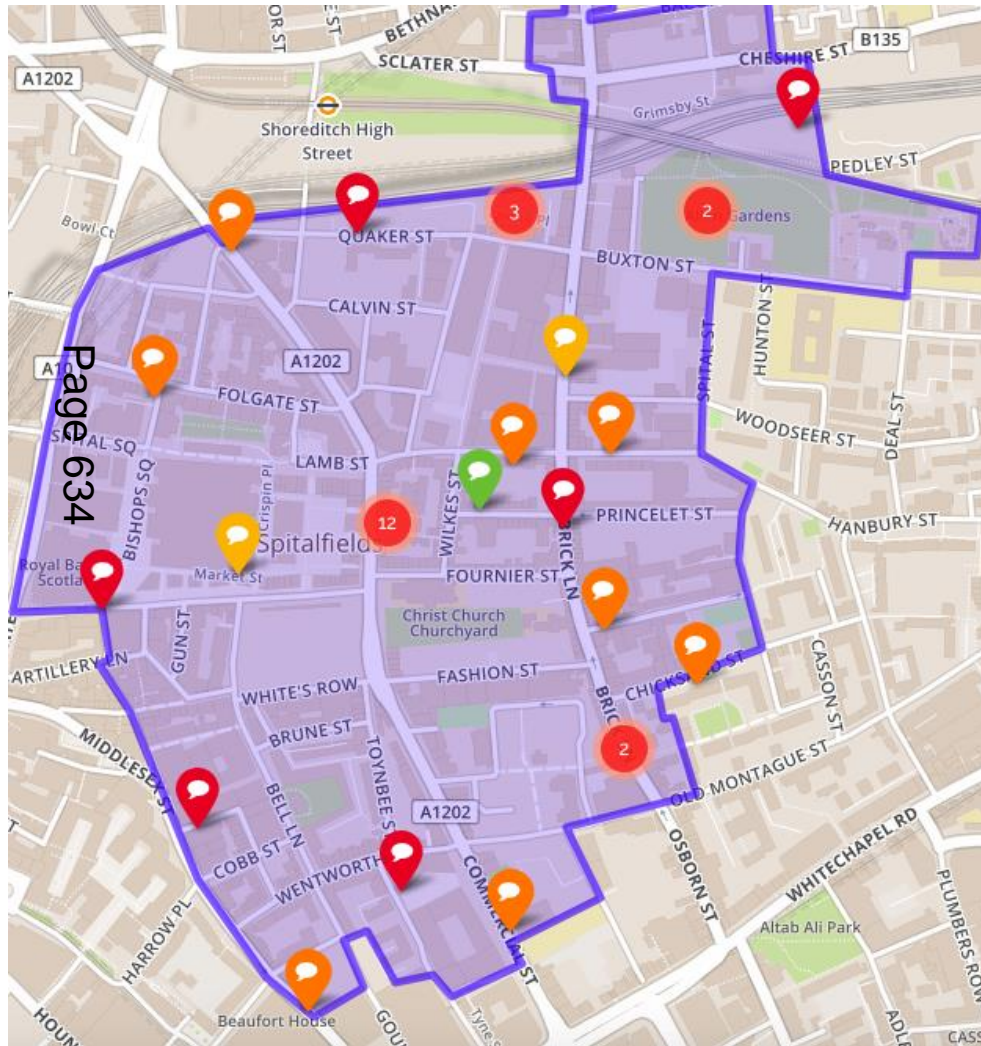
Good Eating out:

- Brick Lane centre
- Wentworth St
- Old Spitalfields Market

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Good%20shopping%22>

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Good%20eating%20out%22>

Over-used / Under-used

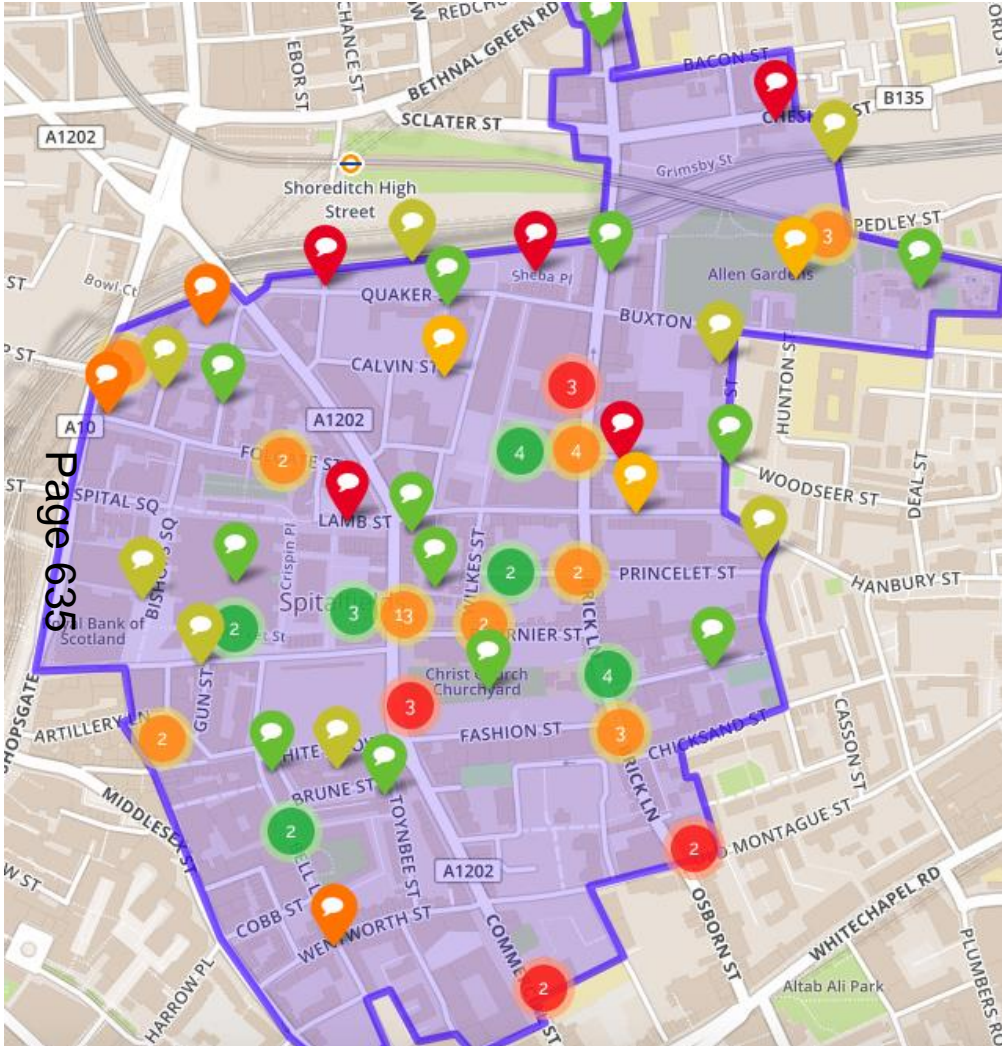


- Over-used:
- Commercial St Centre
 - Saint George
 - Old Truman Brewery

- Under-used:
- Fournier St
 - Old Truman Brewery
 - City Farm

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Over%20used%22>
<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Under%20used%22>

Historic

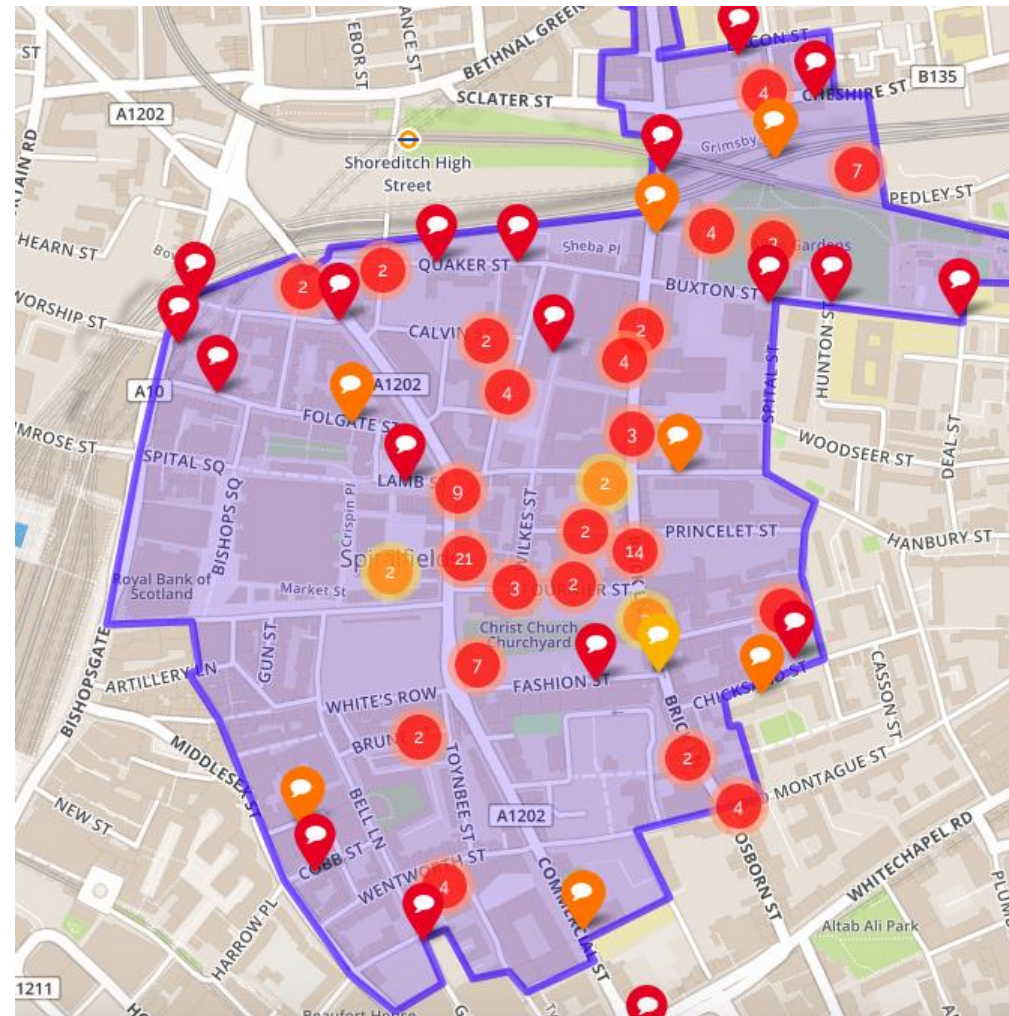
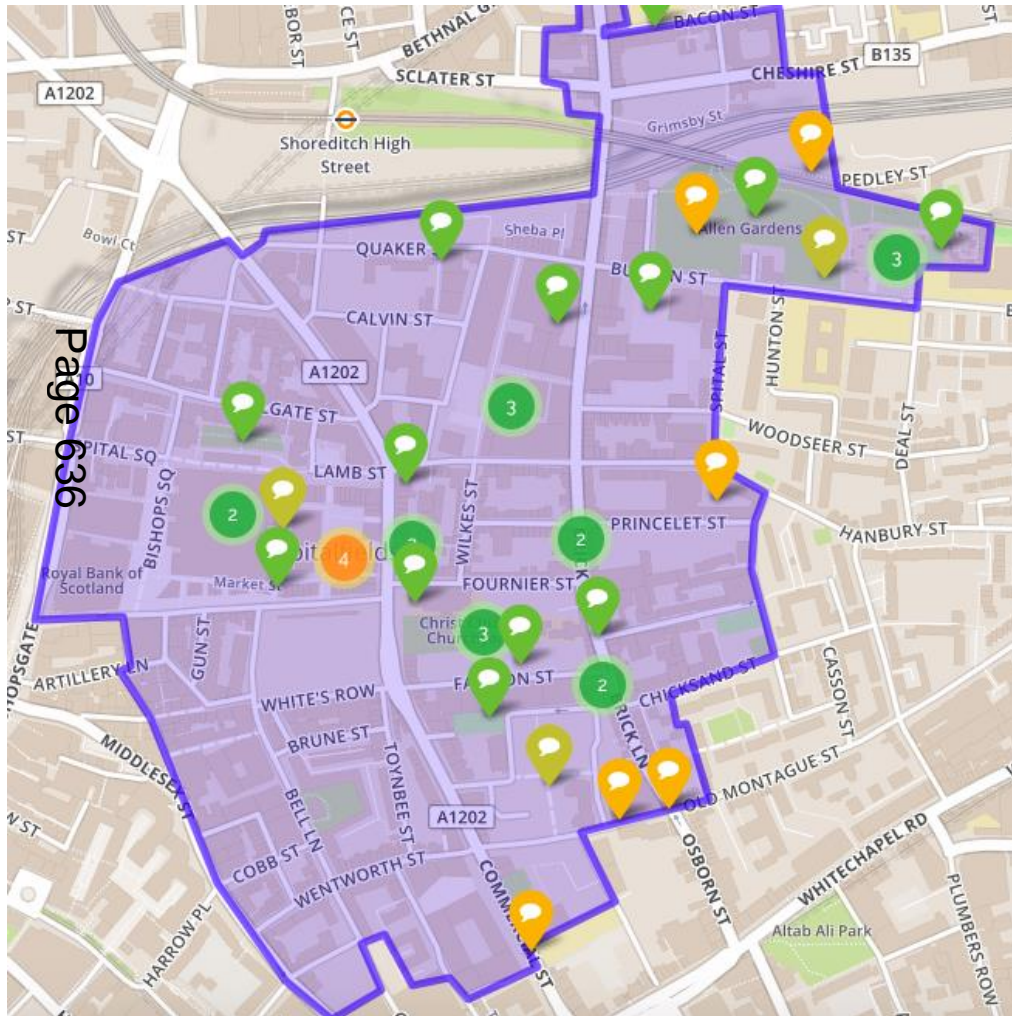


Historic:

- Old Truman brewery
- Fournier St
- Norton Folgate

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Historic%22>

Family friendly / Dangerous



Family Friendly:

- Old Spitalfields Market
- Old Truman Brewery
- Fournier St

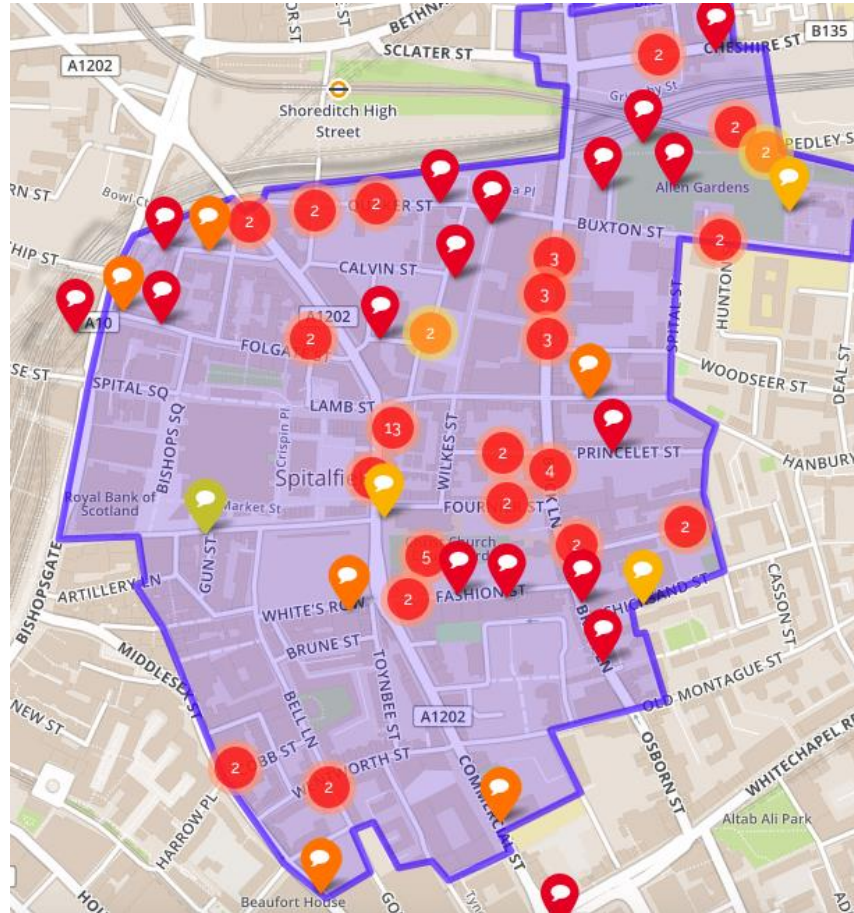
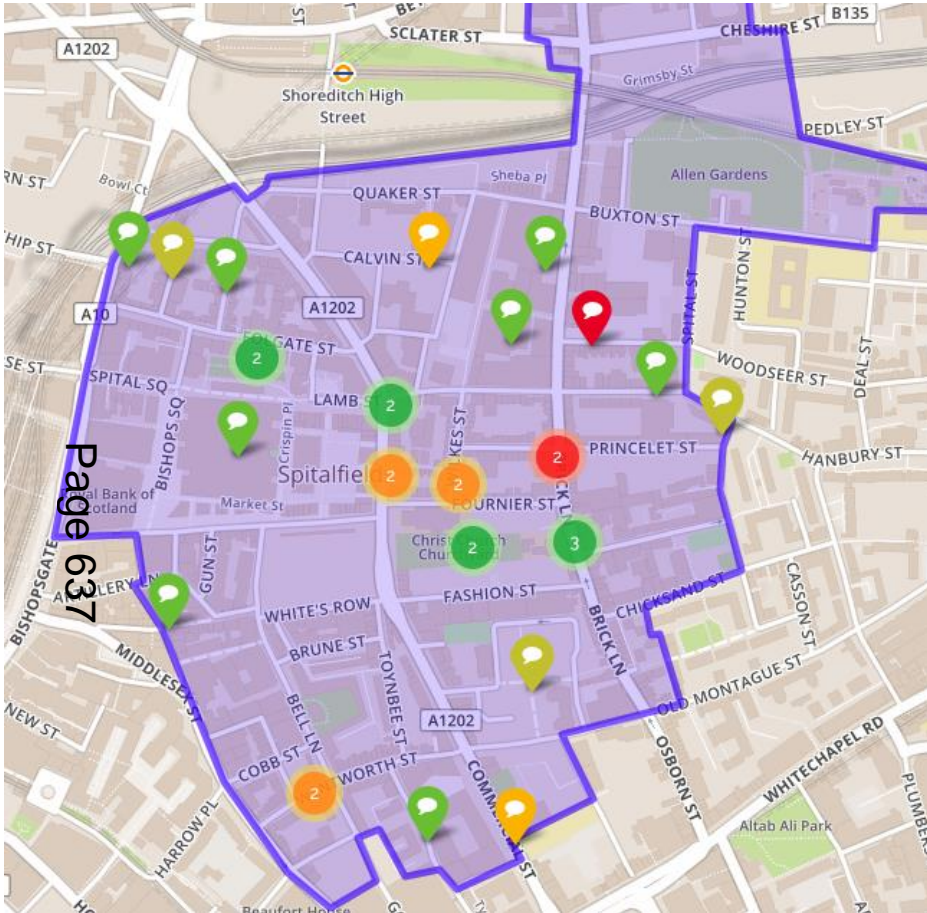
Dangerous:

- Fournier St
- Brick Lane Centre
- Commercial St Centre

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Family%20friendly%22>

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Dangerous%22>

Well designed / Badly designed



Well designed:

- Fournier St
- Brick Lane Centre
- Old Truman Brewery
- Norton Folgate

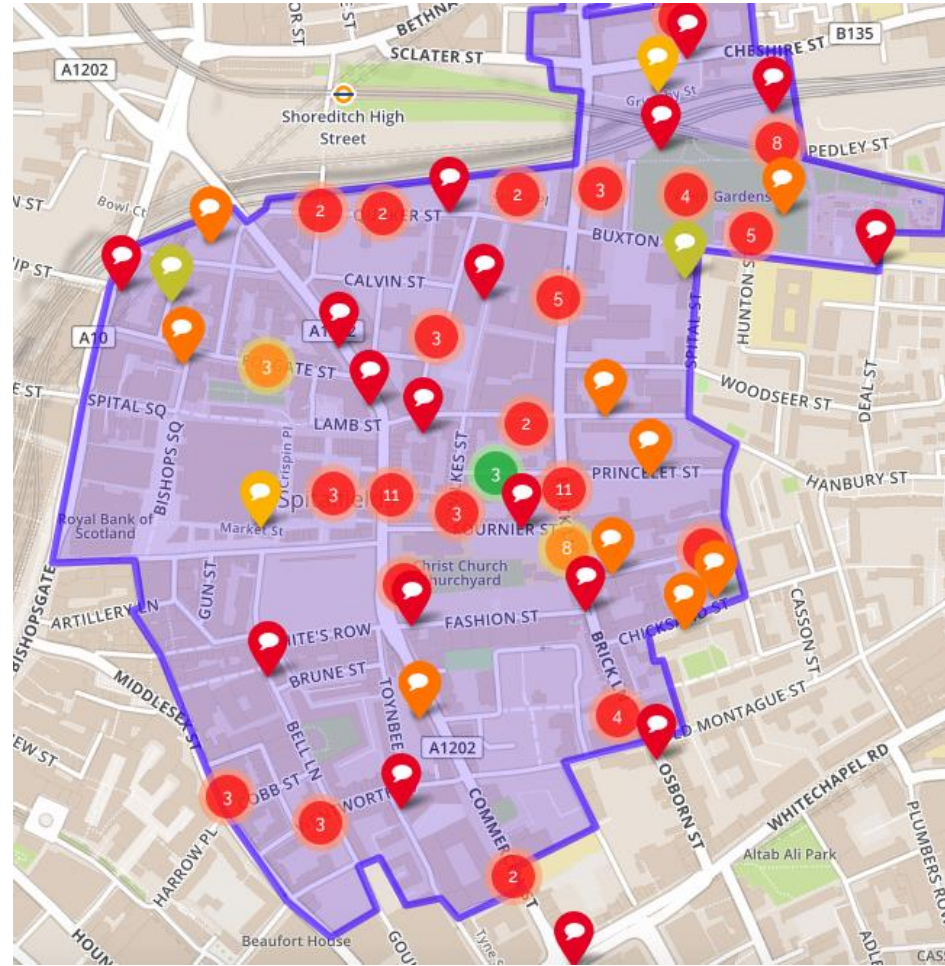
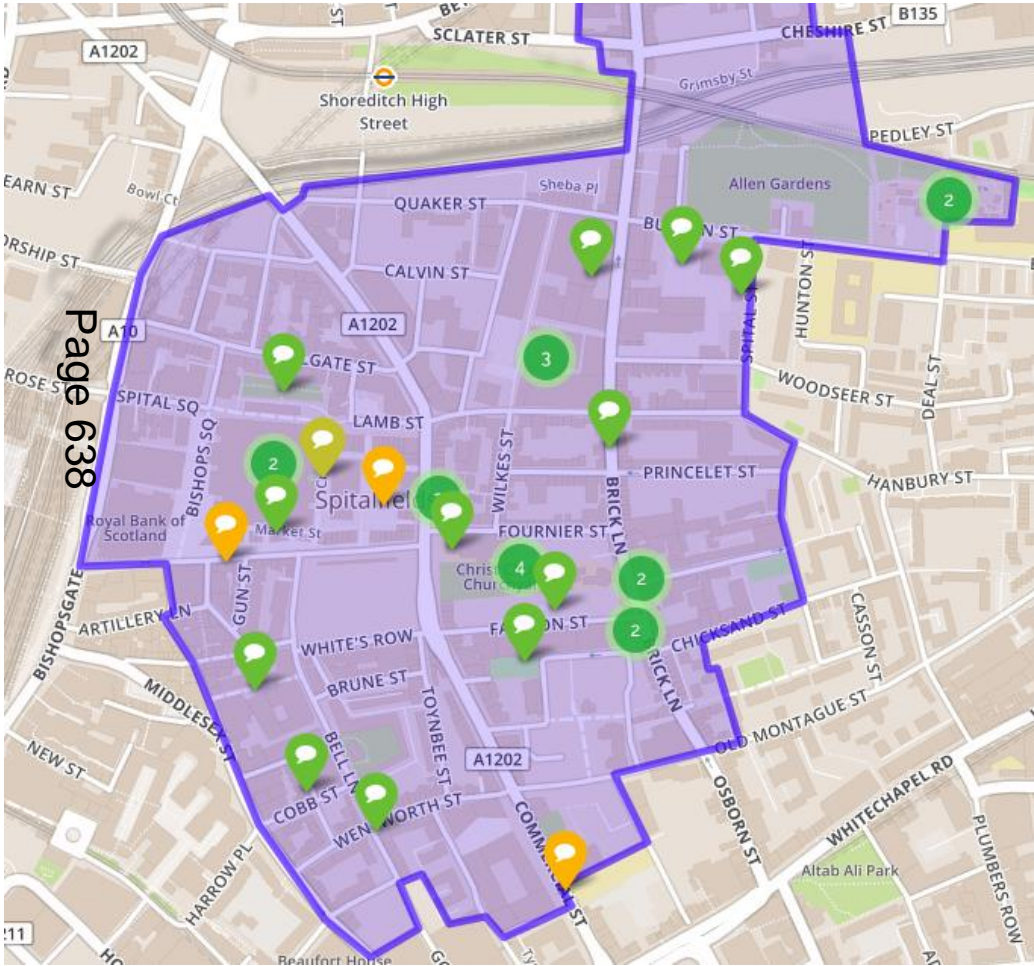
Badly designed:

- Old Truman Brewery
- Fournier St
- Commercial St centre

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Well%20designed%22>

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Badly%20designed%22>

Well maintained / Poorly maintained



Well maintained:

- Old Truman Brewery
- Fournier St
- Brick Lane Centre

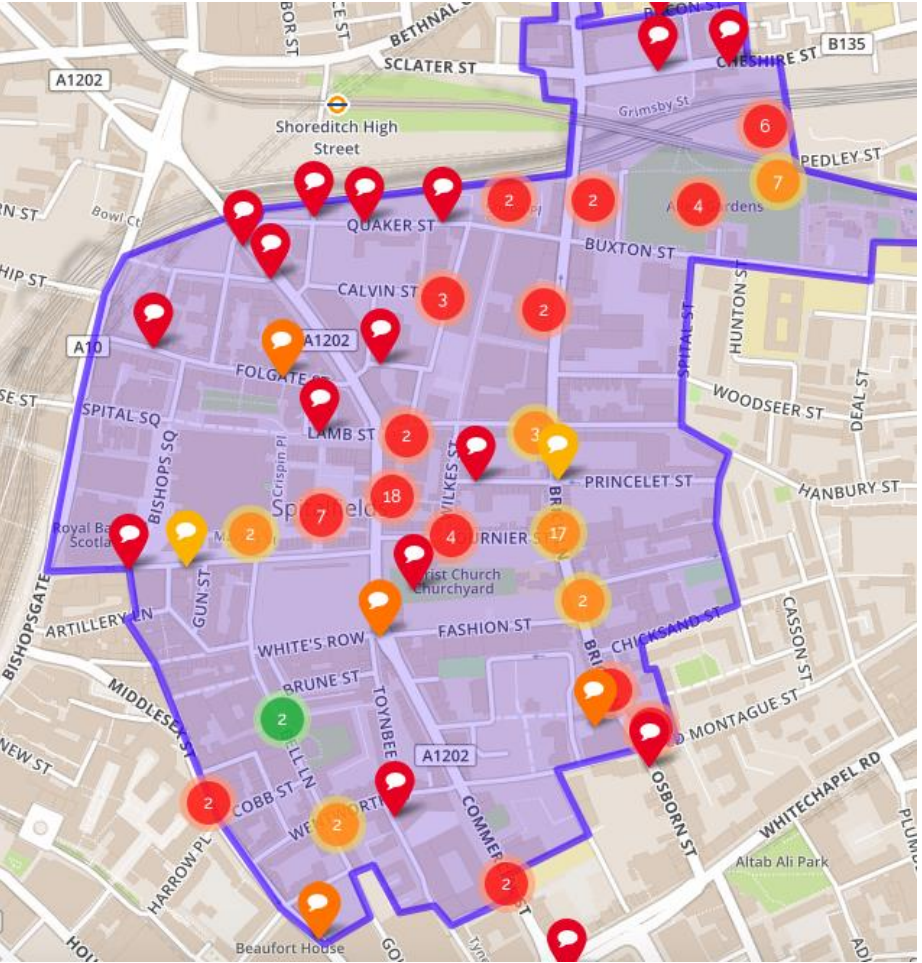
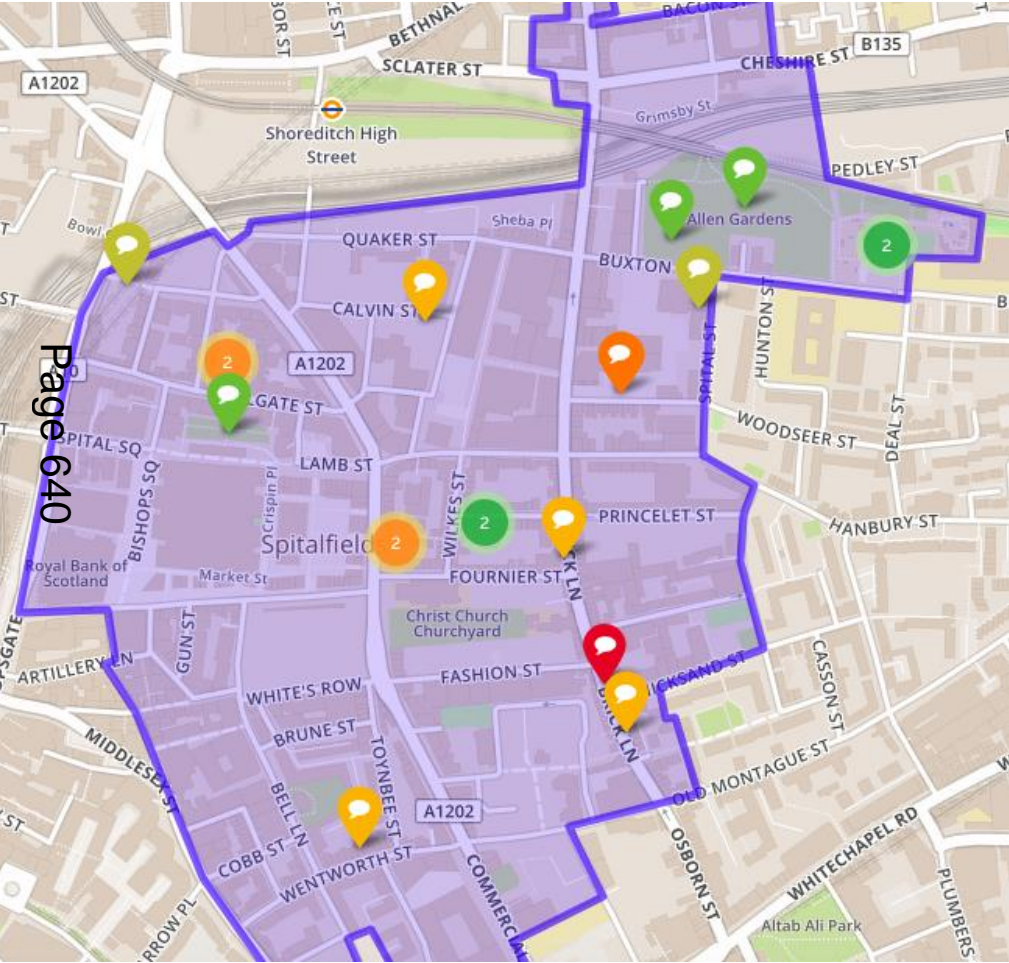
Poorly maintained:

- Fournier St
- Brick Lane Centre
- Quaker St
- Allen Gardens

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Well%20maintained%22>

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Poorly%20maintained%22>

Quiet / Noisy

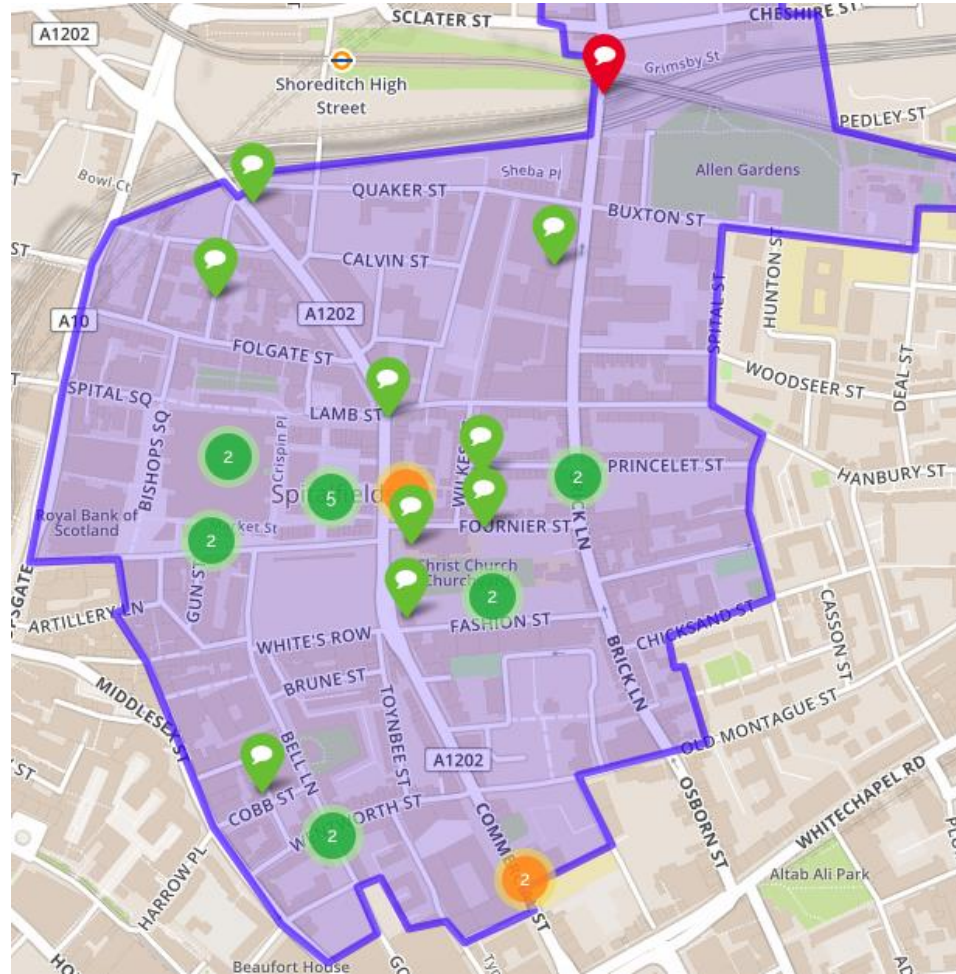
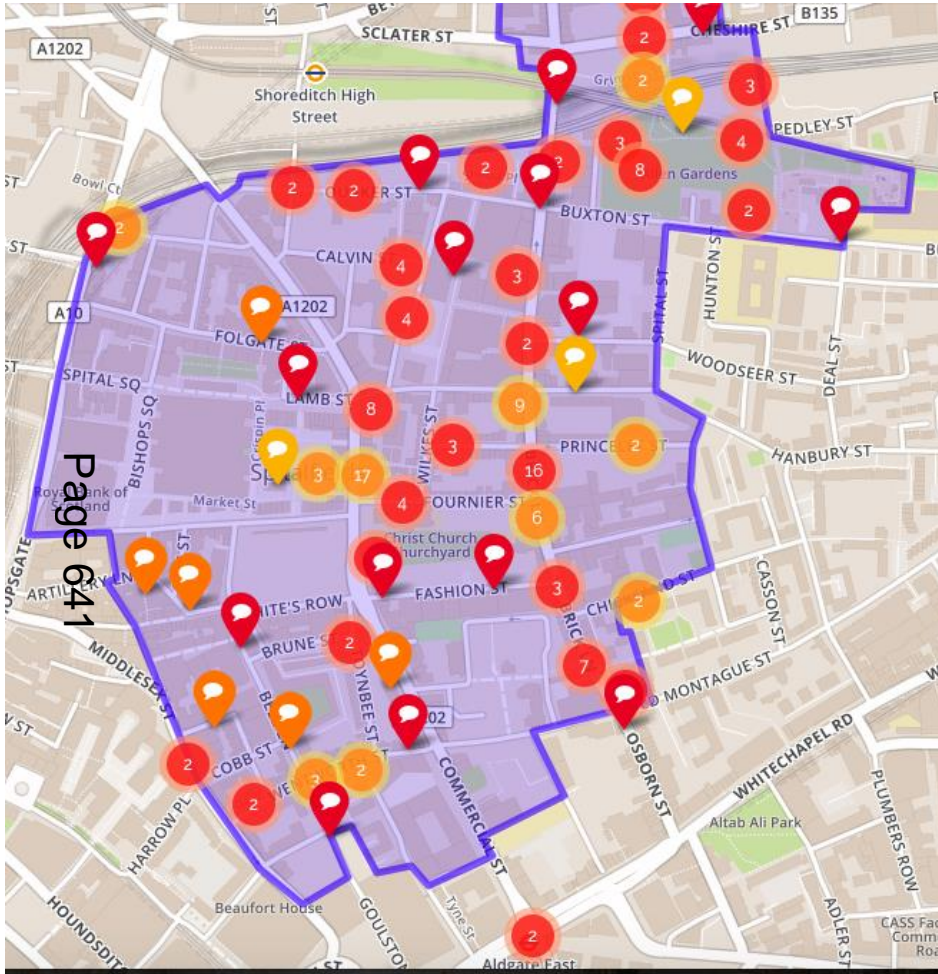


Quiet:
• Norton Folgate

Noisy:
• Brick Lane Centre
• Brick Lane south
• Commercial St centre

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Quiet%22>
<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Noisy%22>

Dirty / Clean



Clean:

- Old Spitalfields Market
- Fournier St

Dirty:

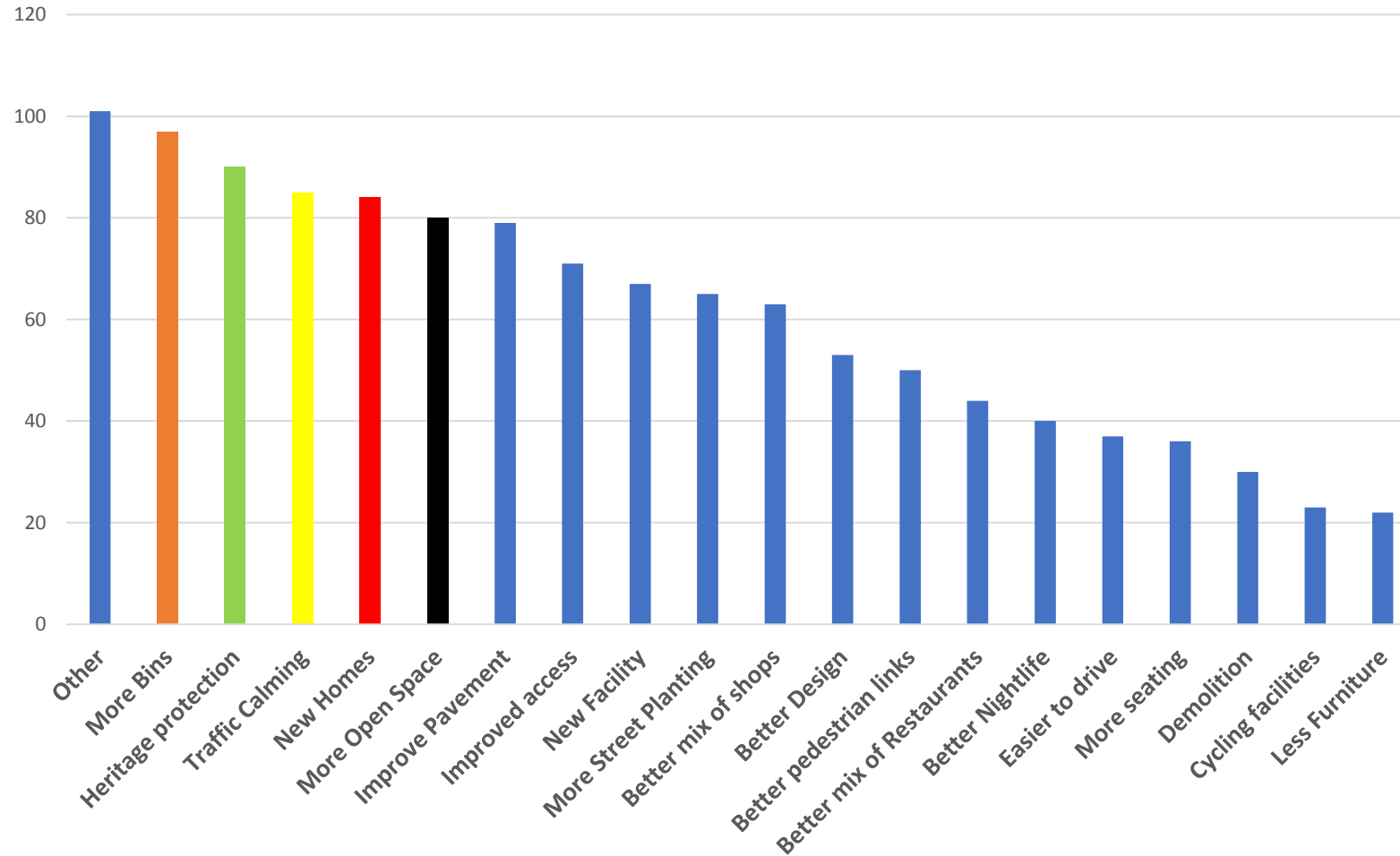
- Brick Lane centre
- Brick Lane south
- Fournier St

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Dirty%22>

<https://spitalfields.commonplace.is/comments?filter=%22whyFeel:Clean%22>

Responses to the question: What improvements would you like to see?

Page 642



Top improvements that people would like to see:

- More Bins
- Heritage Protection
- Traffic Calming
- New Homes
- More Open Space

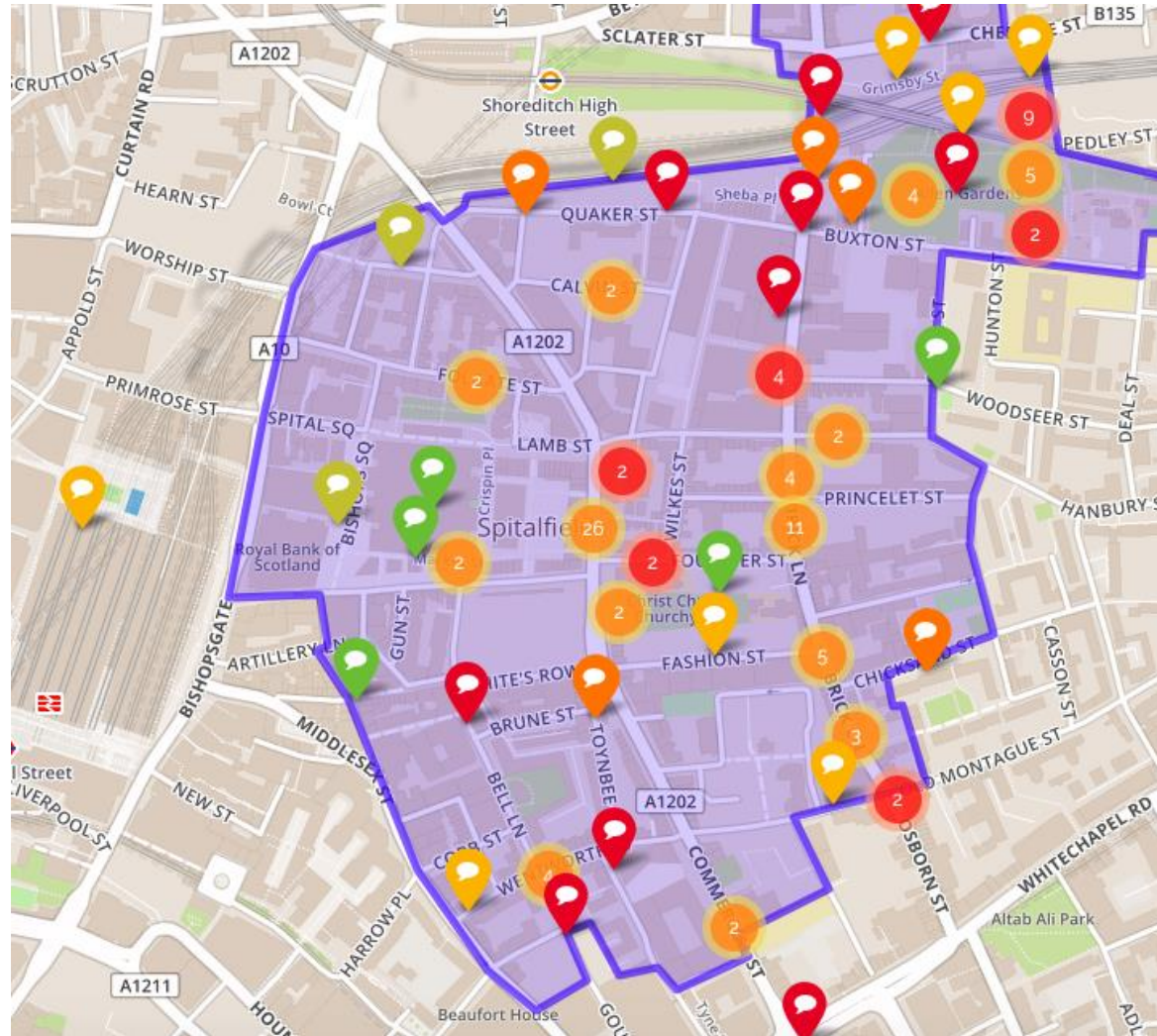
Improvements by age and gender and ethnicity

- Slide to be removed if data not available.

Tags based on location

More bins:

Page 644

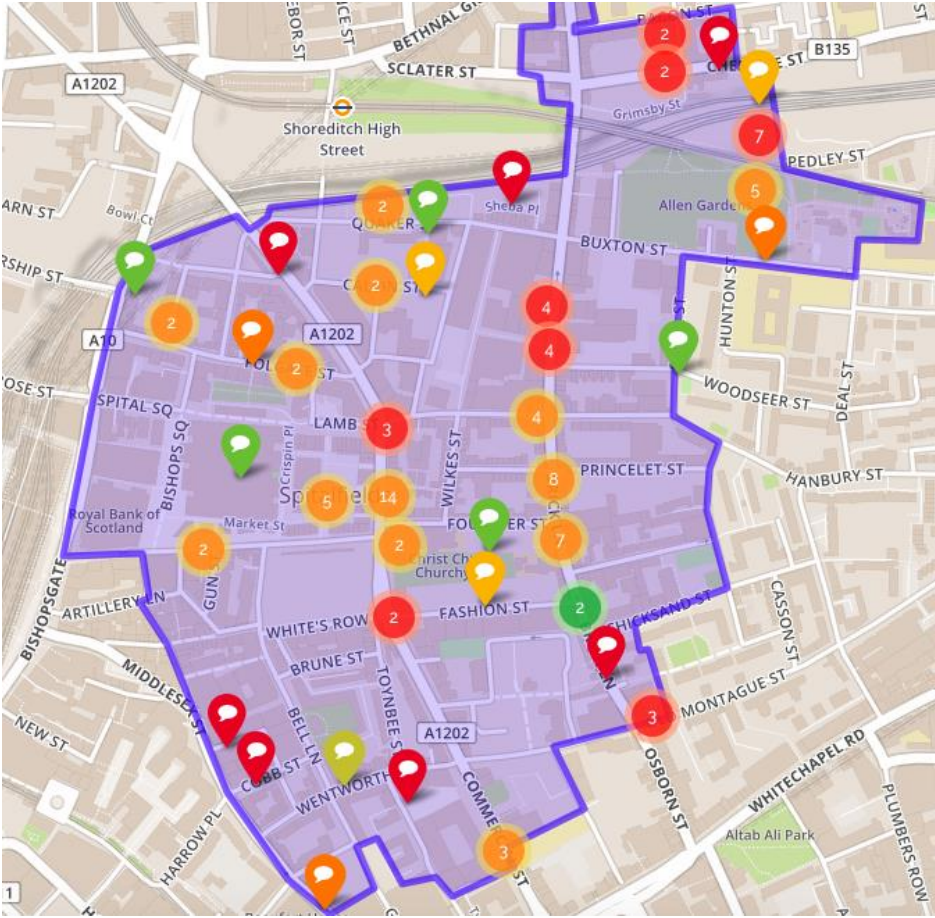


Top 3 areas concerned (estimation):

- Allen Gardens
- Brick lane (all)
- Wentworth St

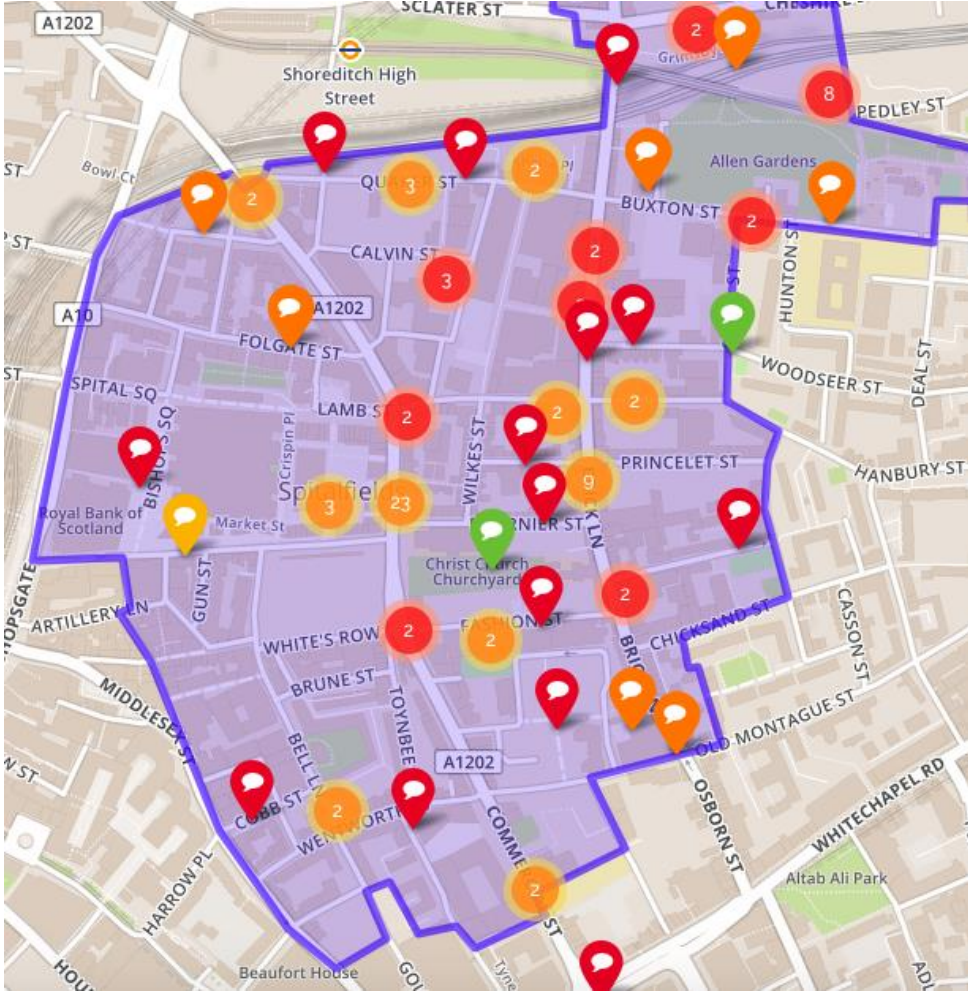
<https://spitalfields.commonplace.is/comments?filter=%22howImprove:More%20bins%22>

Traffic calming:



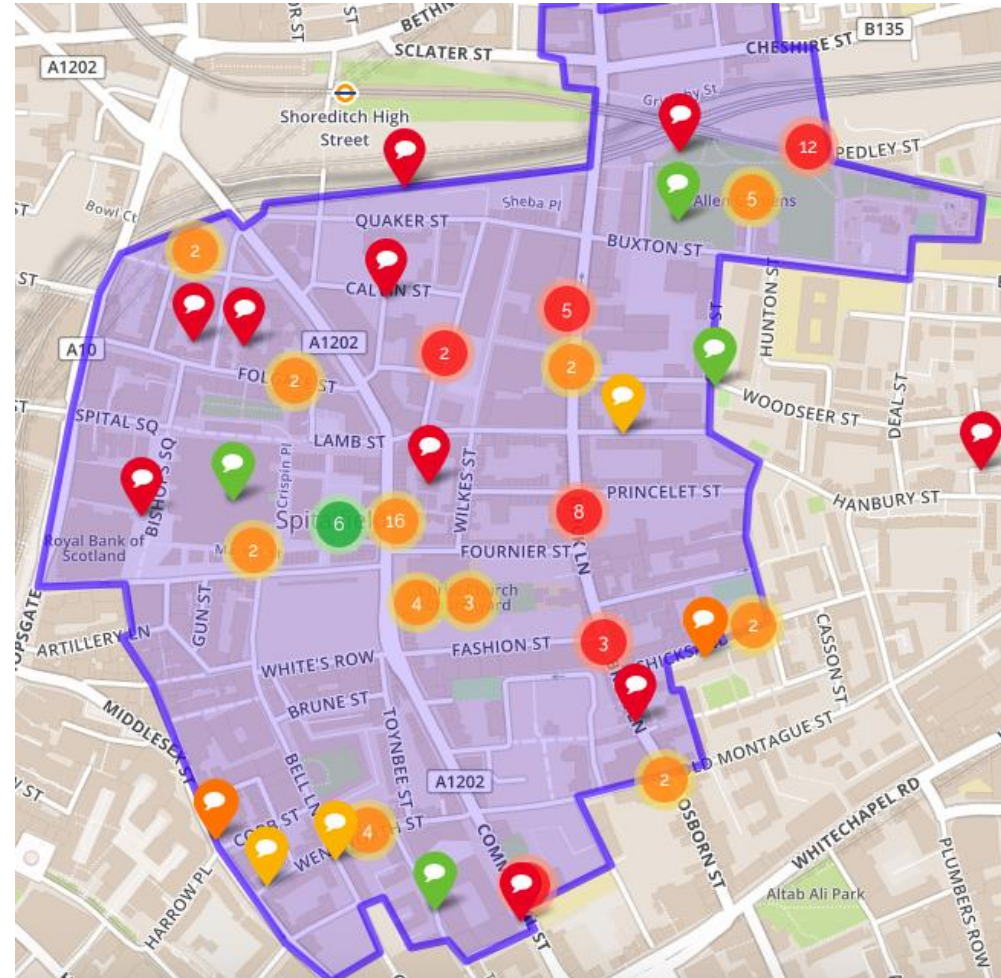
- Brick Lane
- Allen Gardens
- St George

Improve pavements:



- Brick Lane
- Quaker St
- Allen Gardens

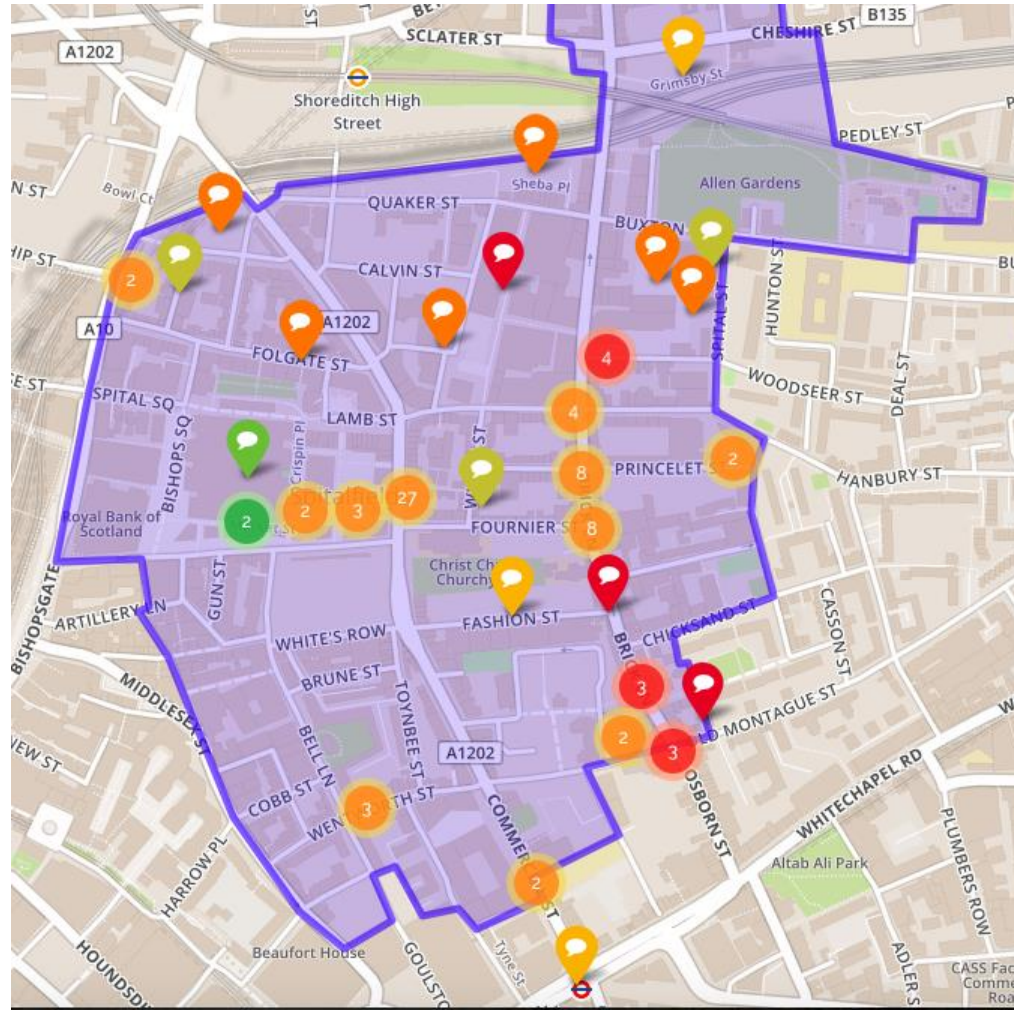
More open spaces



- Fournier St
- Spitalfields Market
- Allen gardens

New homes

Page 648

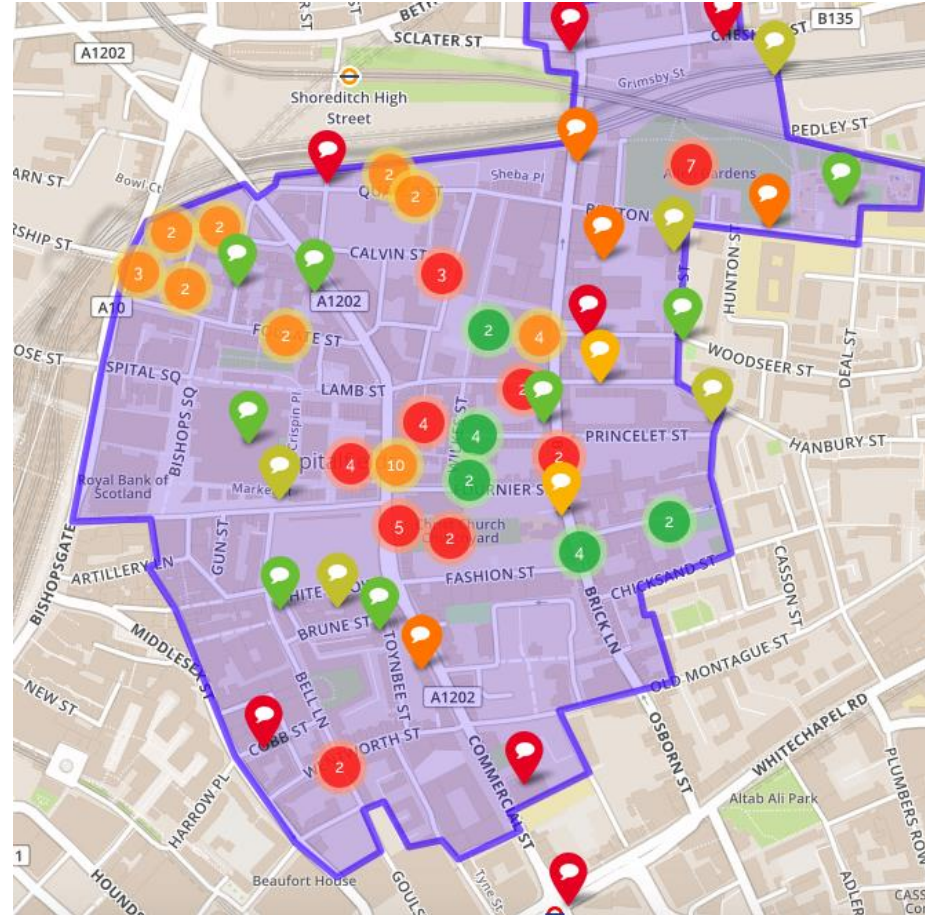


- Spitalfields Market
- Brick lane centre
- Brick lane south

<https://spitalfields.commonplace.is/comments?filter=%22howImprove:New%20homes%22>

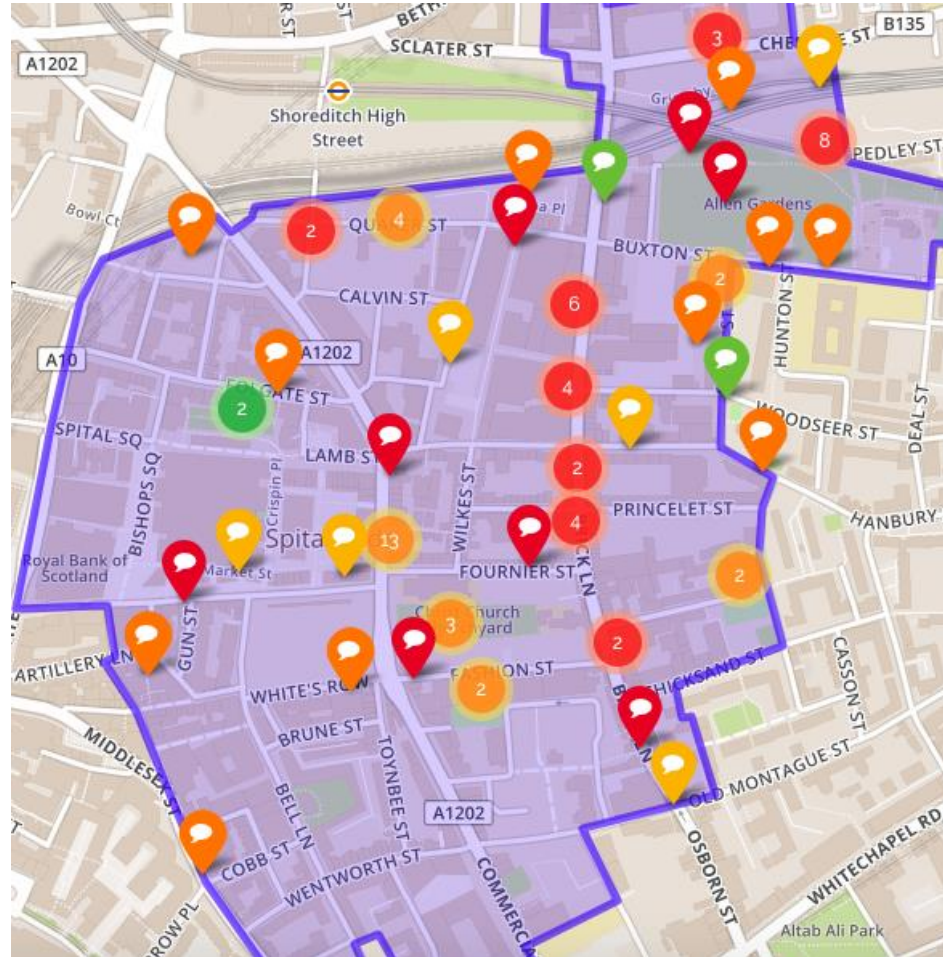
Protection of heritage

Page 649



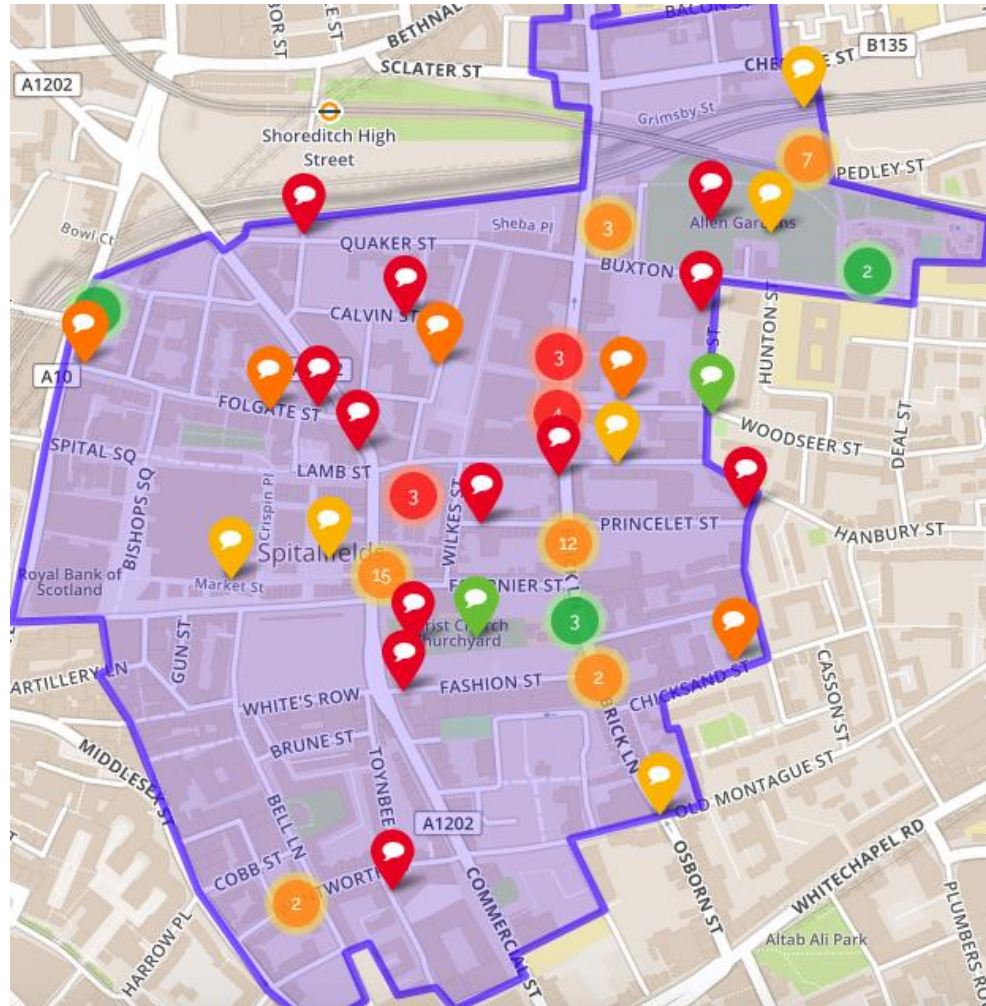
- Universal
- Norton Folgate
- Fournier St
- Commercial St Centre
- Allen Gardens

Improved accessibility



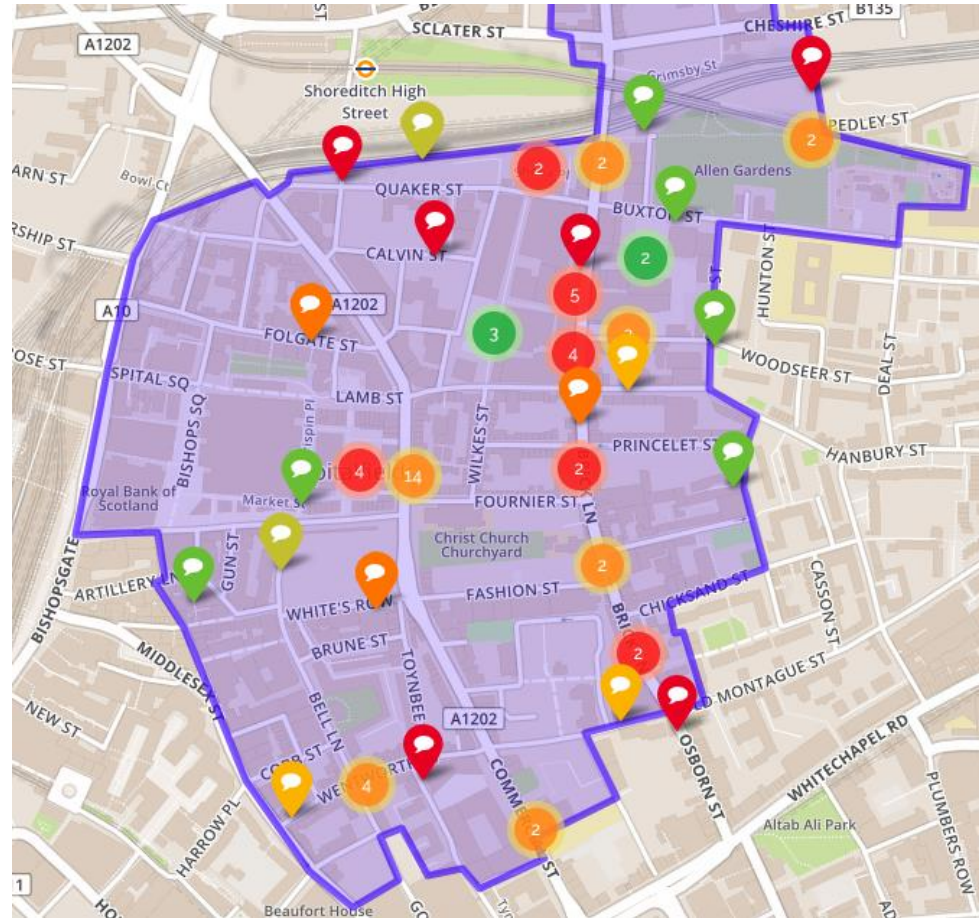
- Brick Lane
- Allen Gardens
- Commercial St South

New public facility/amenity



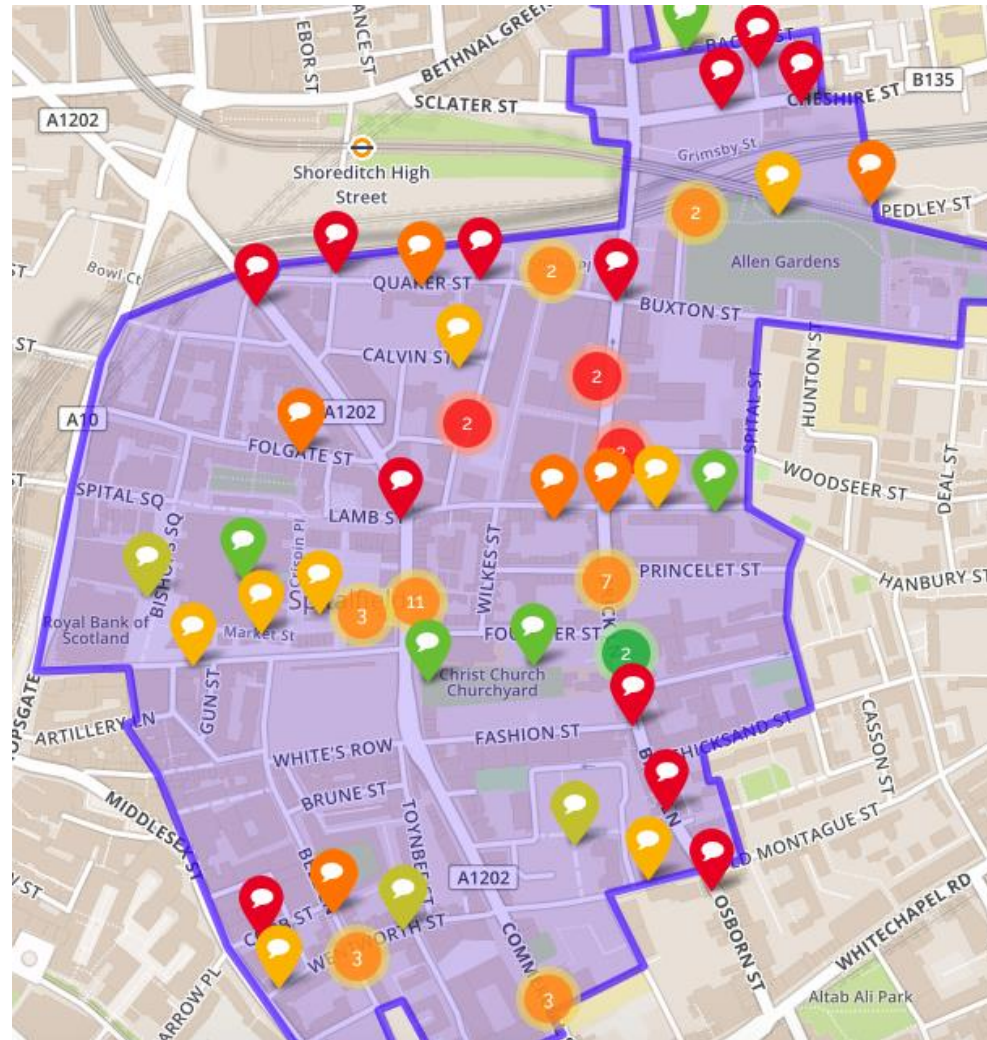
- Old Truman Brewery
- Allen Gardens
- Fournier St/Brick Lane

Better mix of shops



- Brick Lane (all)
- Spitalfields Market
- Wentworth St
- Old Truman Brewery

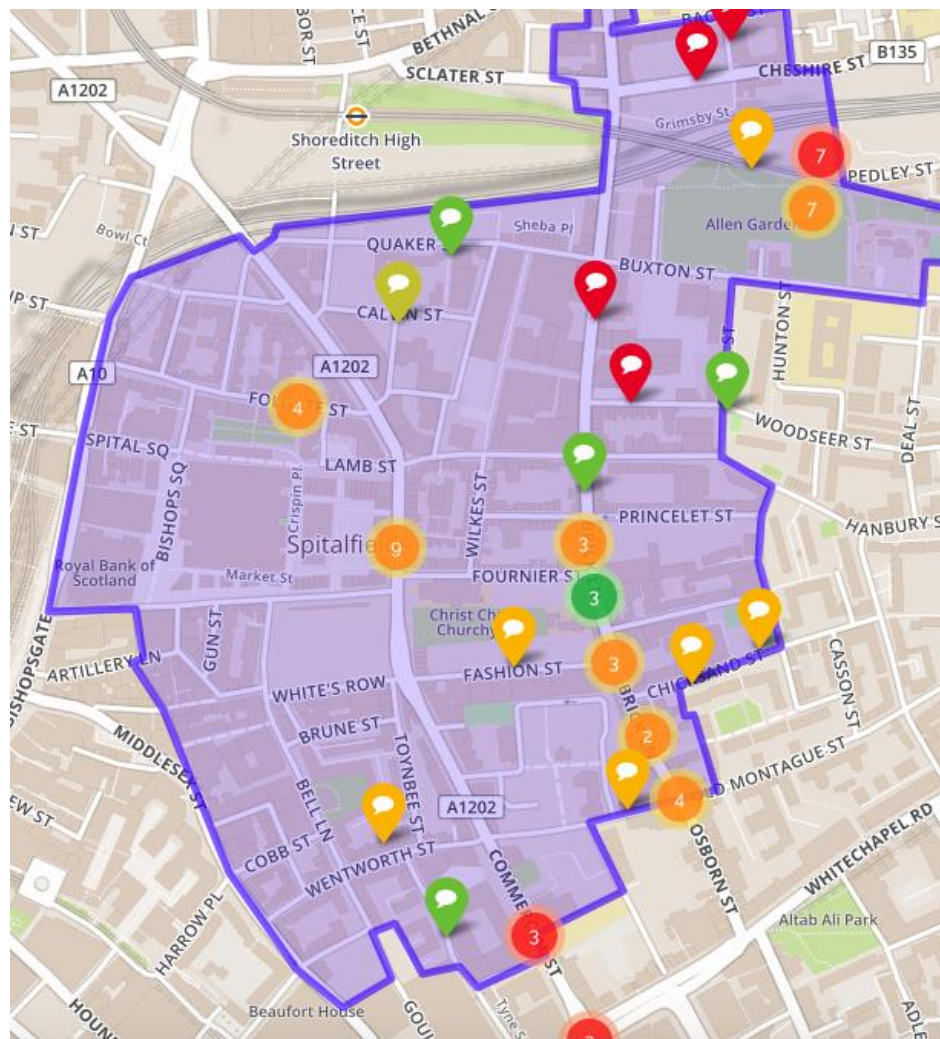
More street planting



- Brick Lane (all)
- Quaker St
- Wentworth St

Easier to drive

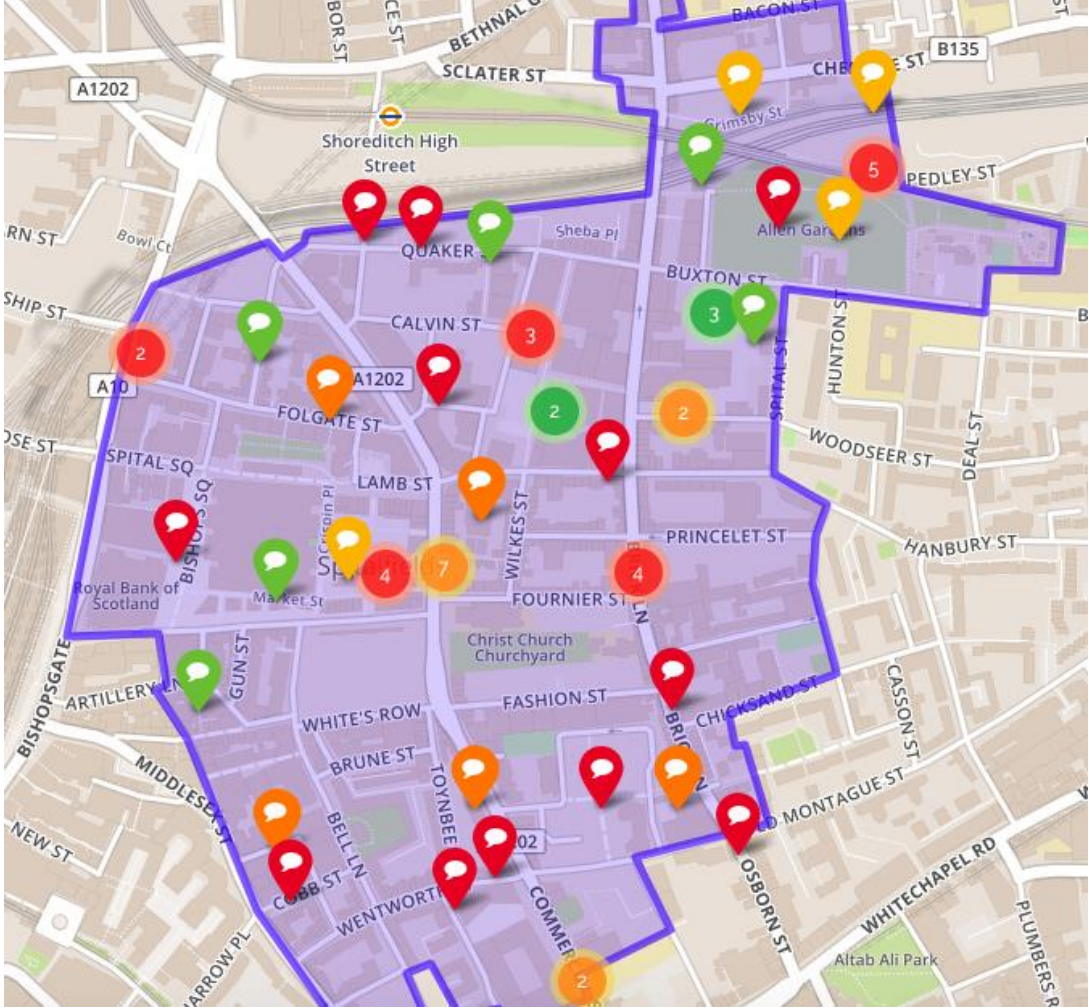
Page 654



- Brick Lane (south and centre)
- Allen Gardens
- Norton Folgate

<https://spitalfields.commonplace.is/comments?filter=%22howImprove:Easier%20to%20drive%22>

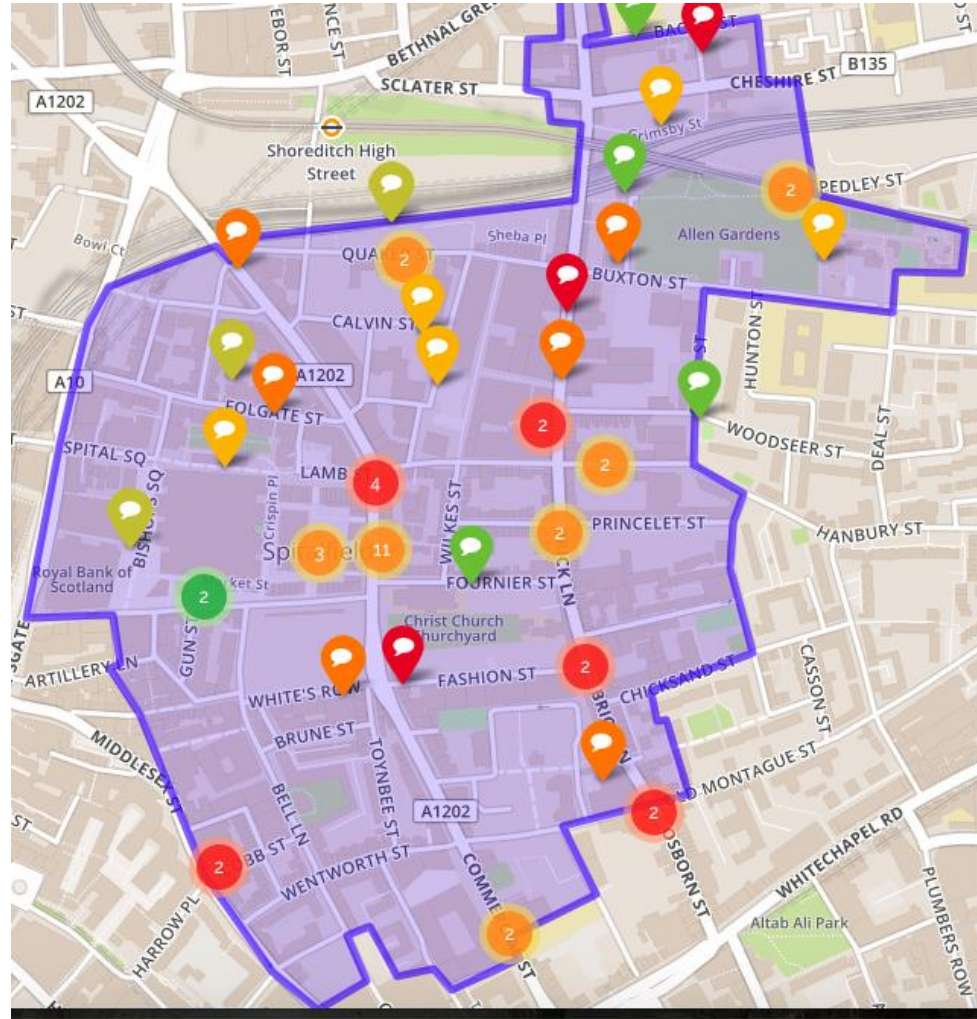
Better designed buildings



- Wentworth St
- Old Truman Brewery
- Allen Gardens

Better pedestrian links

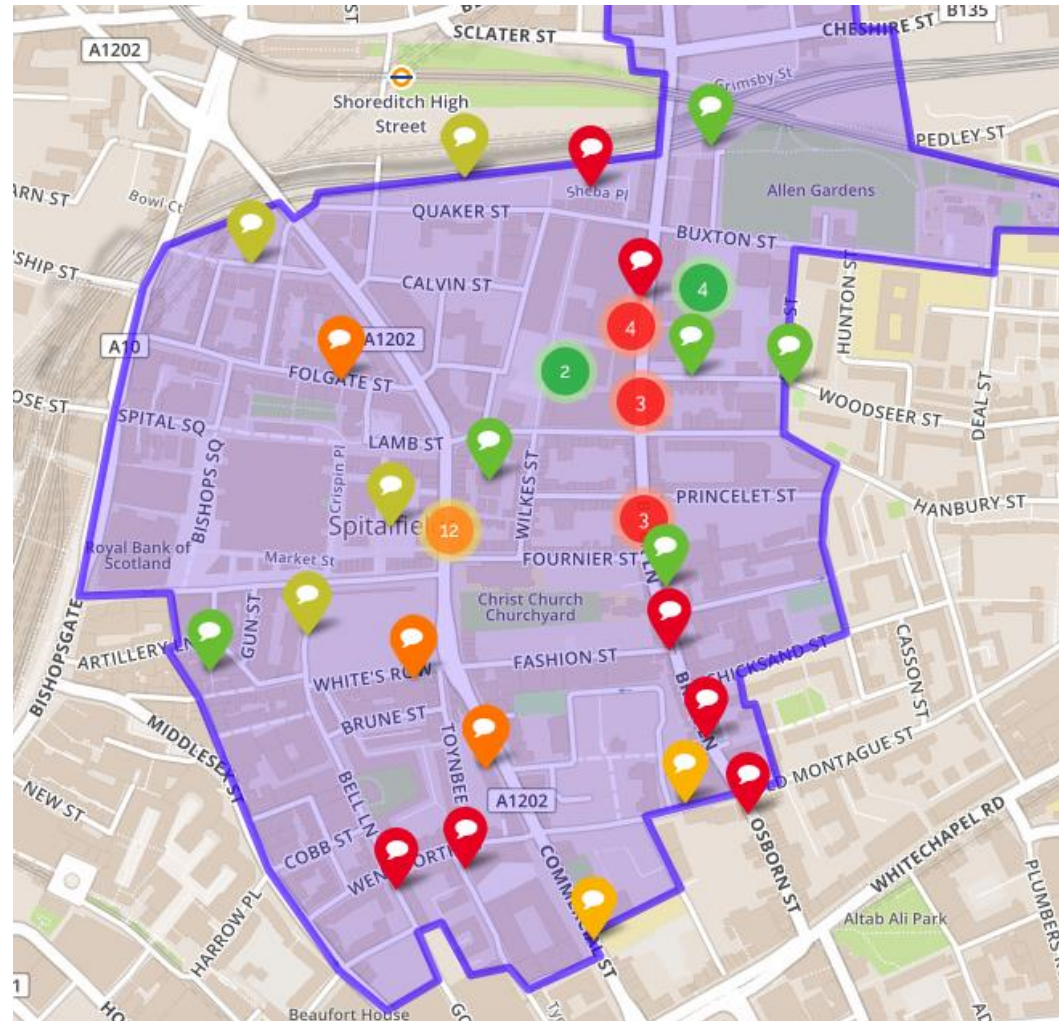
Page 656



- Norton Folgate
- Quaker St
- Brick Lane Center

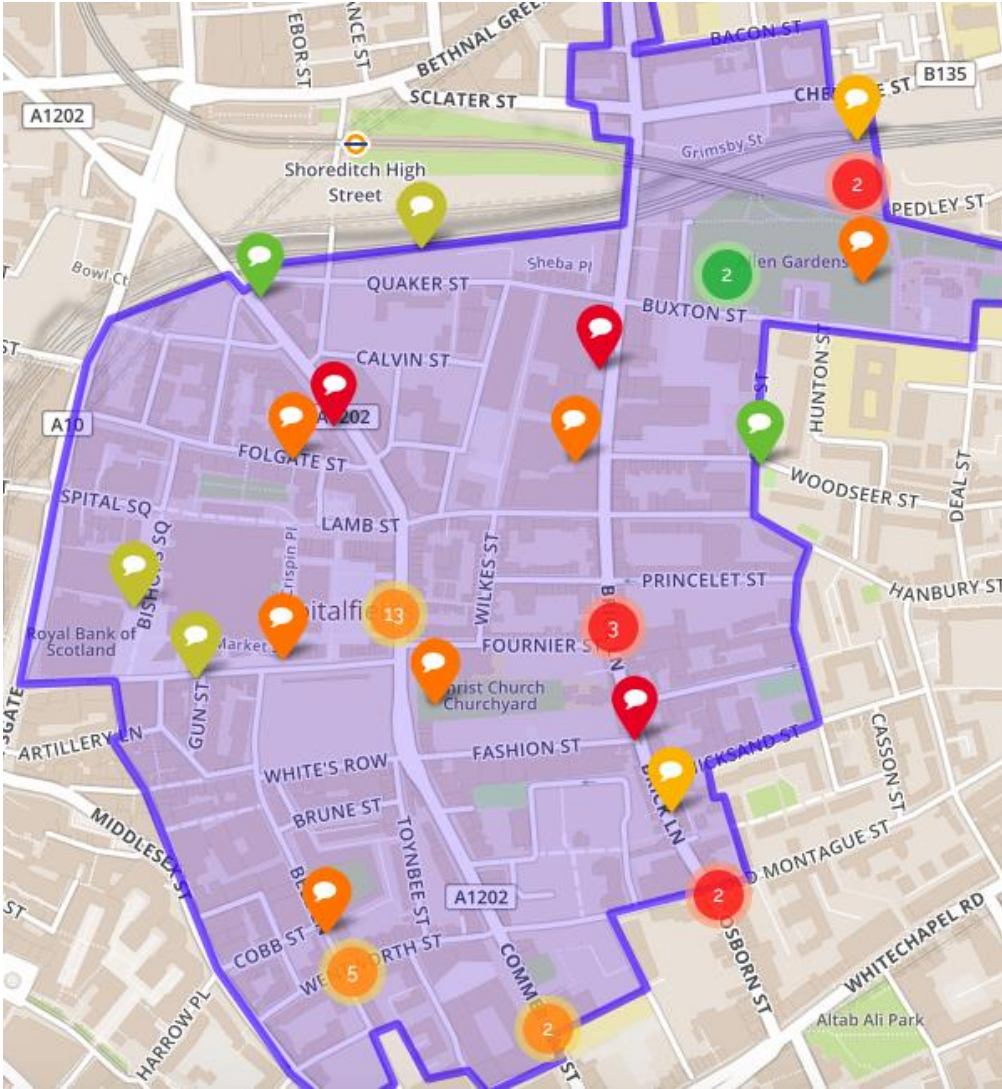
<https://spitalfields.commonplace.is/comments?filter=%22howImprove:Better%20pedestrian%20links%22>

Better mix of restaurants



- Brick Lane South
- Old Truman Brewery

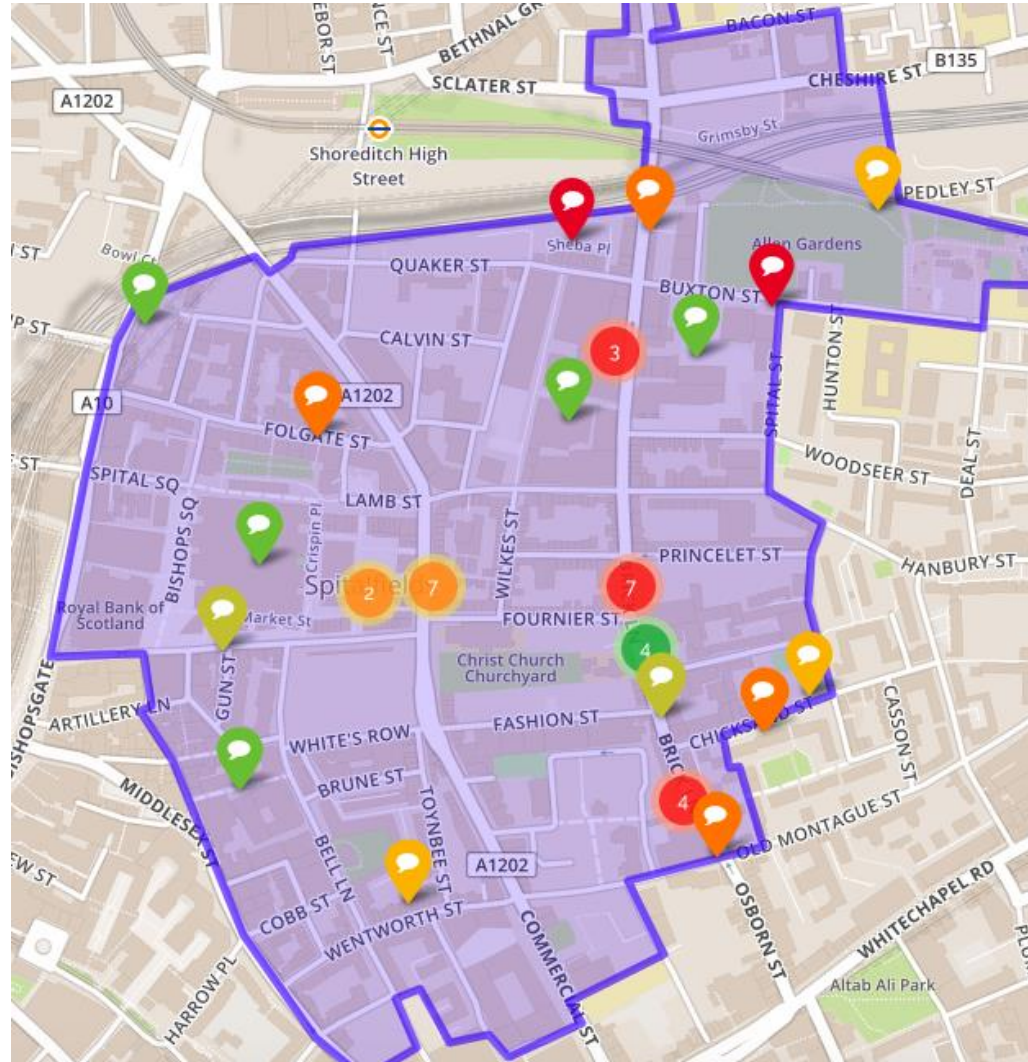
More seating



- Wentworth St
- Brick Lane South
- Allen Gardens

Better nightlife

Page 659

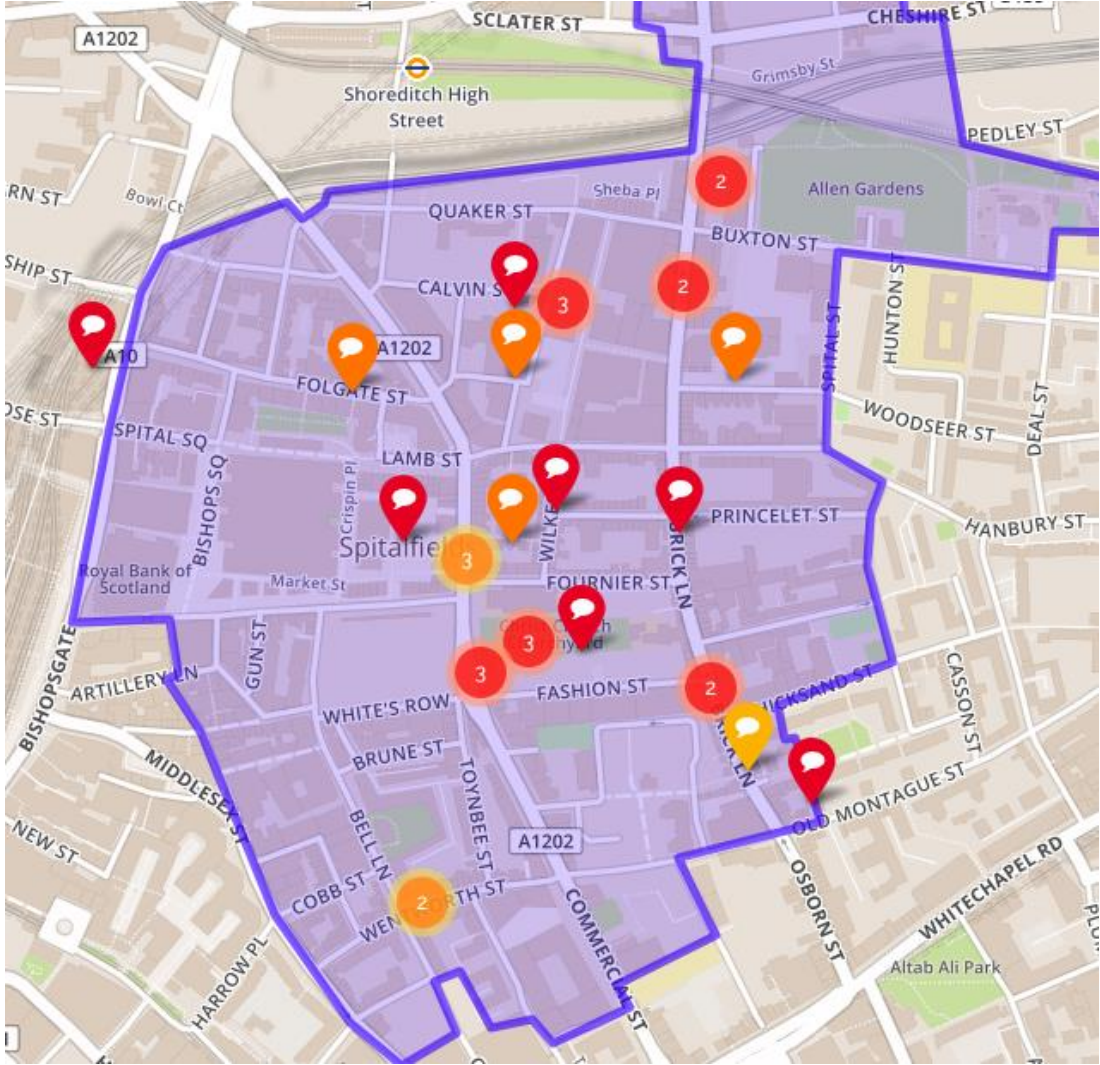


- Brick Lane South
- Spitalfields Market
- Old Truman Brewery

<https://spitalfields.commonplace.is/comments?filter=%22howImprove:Better%20nightlife%22>

Demolition

Page 660

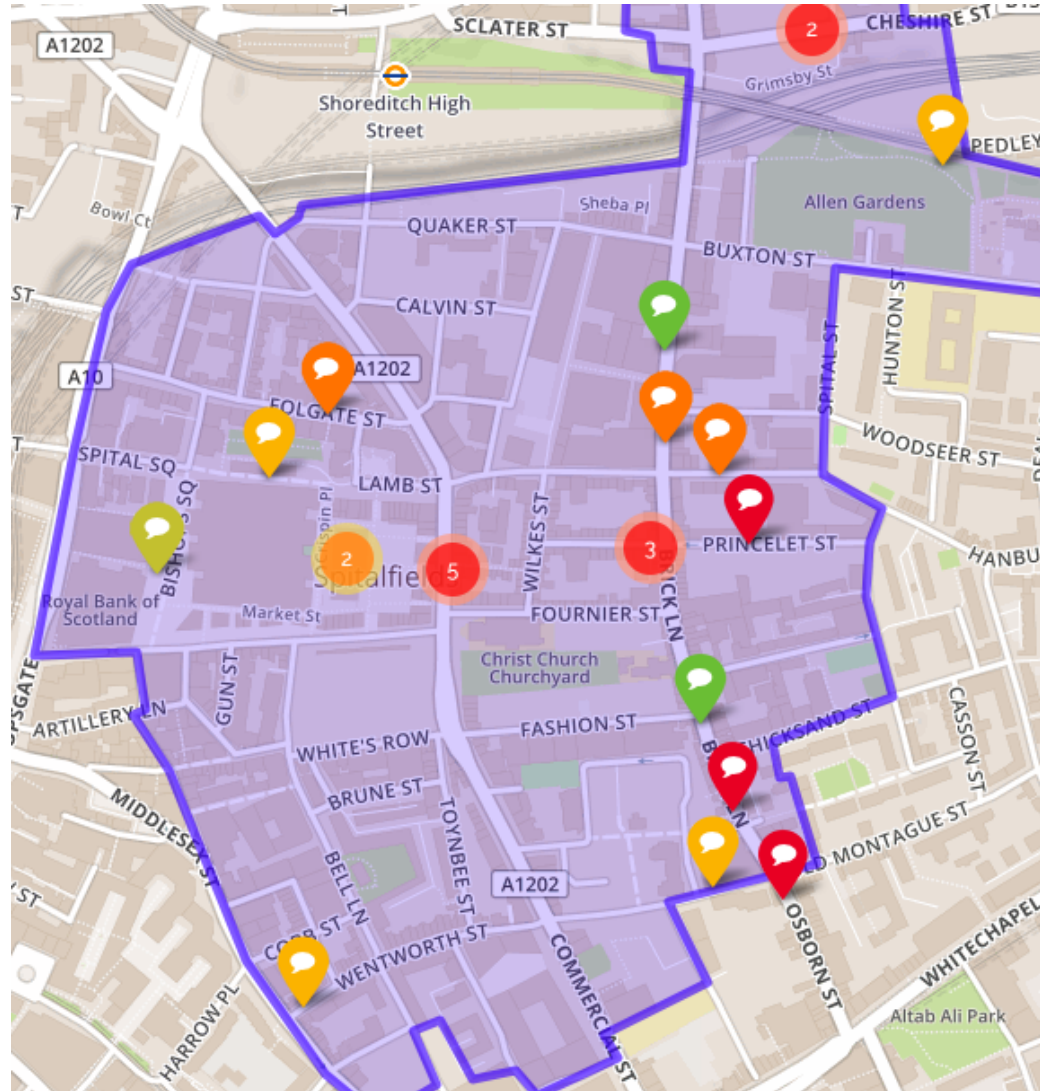


- Fournier St
- Old Truman Brewery
- Commercial St North

<https://spitalfields.commonplace.is/comments?filter=%22howImprove:Demolition%22>

Cycling facilities

Page 661



- Fournier St
- Spitalfields market
- Brick Lane South

<https://spitalfields.commonplace.is/comments?filter=%22howImprove:More%20cycling%20facilities%22>

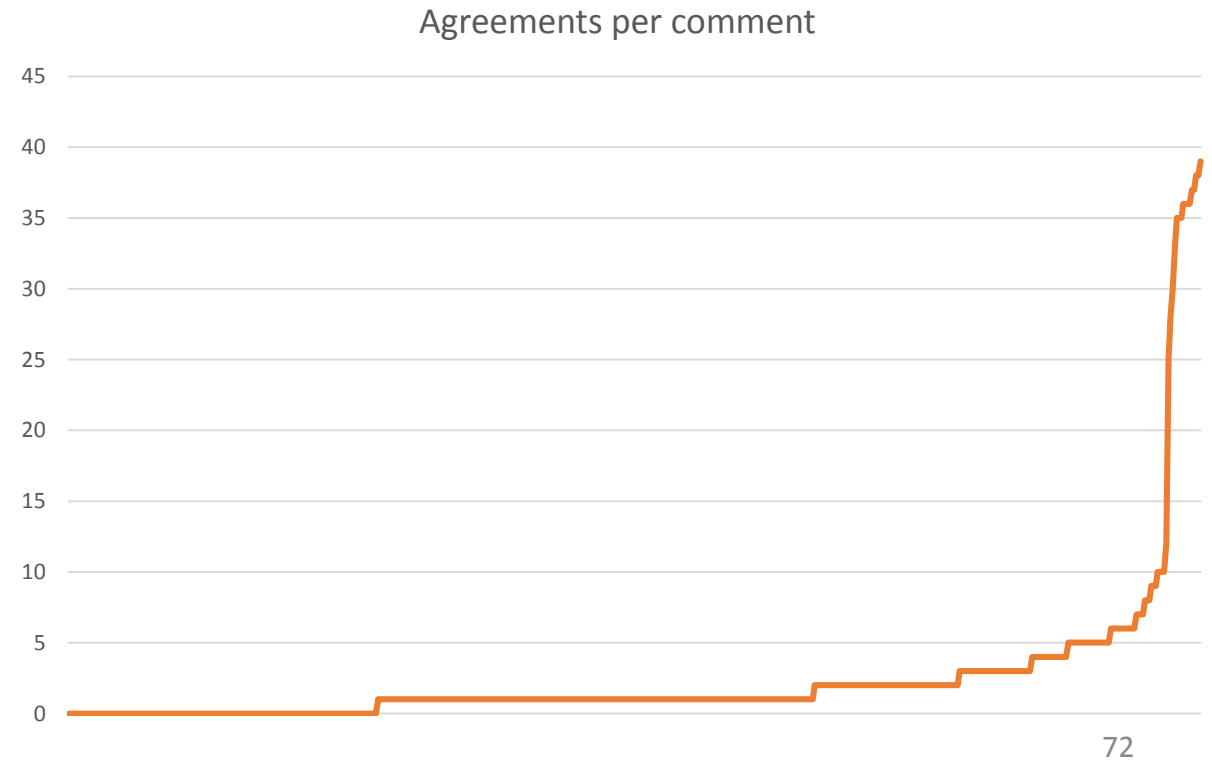
Other suggested improvements:

- Increased police/ CCTV
- Enlargement of existing green space (e.g. the farm)
- Electronic display in the Commercial St (north) bus shelter
- Pedestrian crossing on Commercial St (north)
- Cycle paths (improvement, moved or changed to be safer)
- More trees
- List buildings to protect them (e.g. OTB)
- Restrict alcohol licensing (Bishop's Square)
- Parking (more residential parking)
- Signage (Spitalfields, conservation areas)
- Street cleaning
- Safeguard small/local businesses
- More street lighting
- Pedestrianisation various sections of the area
- Remove telephone box (Commercial St/ Christ Church).

Agreements

- Of the 535 comments 73% had 1 or more agreement.
- 21 had 10 or more agreements.
- The most agreements was 39.

Page 664



Comments with the most agreements:

Most of the top agreed with comments concerned The Truman Brewery, for example:

‘More active uses within the Truman Brewery site would help to bring foot traffic off the main public thoroughfares such as Brick Lane and Hanbury Street.’

These were counteracted by comments such as:

‘Truman Brewery needs protection. It offers a really diverse number of buildings and spaces, for events and the rapidly changing business use in the area. This must be a coveted site for developers, and if high rise buildings are permitted here Spitalfields will be penned in on all sides, now that Aldgate, the city and Shoreditch are filling with hi-rises’

And:

‘The building which houses the Vintage Market (part of the Truman Brewery estate) should be listed - it is a beautiful old building and it needs protection from crazy development schemes which would destroy the character of Brick Lane.’

Data analysis suggests a coordinated agreement response in support of Truman Brewery development, counteracted by numerous however less ‘agreed with’ comments.

Other comments with top agreements:

A similar story with these other buildings which resulted in high agreements and high counteracting responses:

106 Commercial St:

‘A well designed and well run multi-cuisine restaurant operation would bring this warehouse use building back into **positive use**, would create many **jobs**, and would provide local residents and visitors with greater choice.’

And

‘This area is choc a bloc with food outlets! The last thing we need are 17 more restaurants. This lovely & historic stable block is right in the middle of four streets of houses. If it becomes a food and drink outlet it will have a disastrous impact on residents way of life... Maybe the Forum should even give some thought to registering it as a Community Asset? With a long term plan of developing it into a space for all the community to enjoy?...’

Cooperage building on Spital St:

‘This wonderful building on Spital Street is already fully occupied and home to creative businesses.’

And

‘This historic building in a quiet area needs protection. It also needs to be 'recycled' and brought back to life; perhaps as a light-industrial business, a micro-brewery, a new school, a new medical clinic? it could even be converted into housing but I think re-use as a business or civic amenity would be best.’

This trend is continued elsewhere in the report: for example Old Shoreditch station and Woodseer St.

Other Top Agreements:

Brick Lane: 'Motorbike **parking** facility outside 93 Feet East on Brick Lane
On market days the crush in this bottle neck caused by this bike park is so extreme that pedestrians are forced to walk in the road and are then confronted with moving traffic. Attempting to push a push-chair or a pram down here is an extremely scary experience.'



Brick Lane: 'Parking bays blocking pavement'

Brick Lane: 'Brick Lane becoming a **pedestrian** precinct would provide many advantages:

- 1) Current dangerously speeding vehicles would no longer be permitted
- 2) The current ability of drug-dealers to drive fast around the local streets would be hindered
- 3) There would be additional space for restaurant seating and family leisure
- 4) It should encourage and enhance the economic viability of the Brick Lane shops and restaurants.'



Buxton St x Brick Lane: 'The **bins** on this corner are often overflowing and it means the area gets filthy. On a Sunday when the market is on, the bins are already full by 10am. More bins and more rubbish collection are badly needed'

Spitalfields City Farm: 'This farm is crucial to the soul of the area. We have few quiet places and the ability to come here and be surrounded by nature is so important to me. My little daughter also adores this place and without it her life in Spitalfields would be significantly diminished. The farm should have extra **protection** so it can remain a public amenity forever.' (15 agreements)

Code St: 'Lots of **antisocial behaviour** in this area. Too many drunks and drug users make going to the park an unpleasant experience. Drug dealing and drug use happens openly around this area. Litter such as laughing gas canisters, empty cans and bottles and sometimes used syringes can be found all around the park. I would encourage plain clothes police to patrol this area and all of Allen Gardens especially at weekends.' (13 agreements)

Christ Church Garden: 'This park could be lovely but it is extremely **dirty** and used by **drug** addicts and people needing the toilet. There are not enough seats for people to use and the bins are usually overflowing. It needs better monitoring and better facilities.' (9 agreements)

Allen Gardens: 'The park is great but in the summer the **bins** are a disaster and it is filthy. This must be cleaned and maintained better.' (8 agreements)



Spitalfields Neighbourhood Forum



Spitalfields Neighbourhood Plan 2020-2035

Basic Conditions Statement

October 2020

CONTENTS

1	INTRODUCTION	2
	Introduction.....	2
	Key statements	2
2	BASIC CONDITION (I) – CONFORMITY WITH NATIONAL PLANNING POLICY.....	4
	National Planning Policy Framework.....	4
3	BASIC CONDITION (IV) – CONTRIBUTION TO SUSTAINABLE DEVELOPMENT.....	7
4	BASIC CONDITION (V) – GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN	10
5	BASIC CONDITION (VI) – CONFORMITY WITH EU OBLIGATIONS	14
6	BASIC CONDITION (VII) – CONFORMITY WITH THE PRESCRIBED CONDITIONS	15
7	CONCLUSION.....	16

1 INTRODUCTION

Introduction

- 1.1 This Basic Conditions Statement has been produced to accompany Spitalfields Neighbourhood Plan.
- 1.2 The relevant legal framework for the preparation and making of neighbourhood plans is supported by the Localism Act 2011 and the Neighbourhood Planning Act 2017 and found in the:
- Town and Country Planning Act 1990: ss. 61F, 61I, 61M-P and Schedule 4B
 - Planning and Compulsory Purchase Act 2004: ss 38A-C
 - Neighbourhood Planning (General) Regulations 2012 (2012 No.637) (As Amended)
- 1.3 Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990 requires a neighbourhood plan to meet five¹ basic conditions before it can proceed to a referendum. These are:
- I. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - II. The making of the neighbourhood development plan contributes to the achievement of sustainable development;
 - III. The making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - IV. The making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations; and
 - V. Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The prescribed condition is that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.
- 1.4 This document sets out how the Plan meets the Basic Conditions.

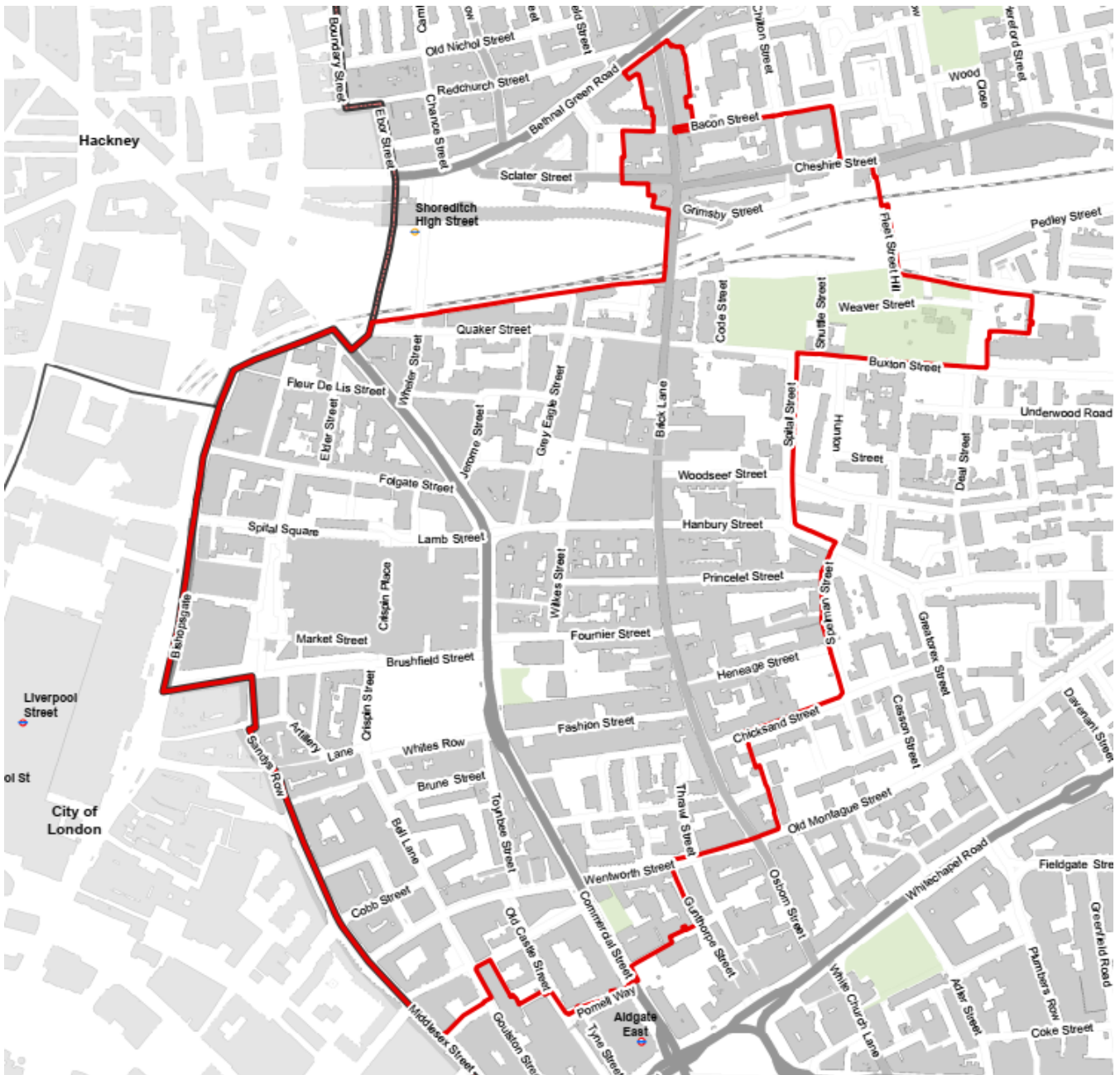
Key statements

- 1.5 The Plan sets out policies that relate to the development and use of land within only the Spitalfields Neighbourhood Area. All of the area lies in the London Borough of Tower Hamlets. This is shown in Figure 1 below. This demonstrates compliance with Regulation 15(a) of the Neighbourhood Planning Regulations.
- 1.6 The Plan refers only to the administrative boundary of Spitalfields. There are no other adopted Neighbourhood Development Plans that cover the Spitalfields Neighbourhood Area.

¹ There are two further basic conditions, which are relevant only to the making of a Neighbourhood Development Order and are therefore not considered in this document.

- 1.7 Spitalfields Neighbourhood Forum, as the qualifying body, has prepared the Plan, which covers the neighbourhood area of Spitalfields. This area was designated by the London Borough of Tower Hamlets in April 2016.
- 1.8 The Spitalfields Forum Council has prepared the Plan to establish a vision for the future of the neighbourhood area. The community has set out how that vision will be realised through planning and controlling land use and development change over the plan period 2020 to 2035.

Figure 1: Spitalfields Neighbourhood Plan Area



Source: London Borough of Tower Hamlets

2 BASIC CONDITION (I) – CONFORMITY WITH NATIONAL PLANNING POLICY

- 2.1 To meet this condition, the Plan must be shown to have regard to national policies and advice contained in guidance issued by the Secretary of State. National policy and guidance is contained within the National Planning Policy Framework ('NPPF') and the Planning Practice Guidance ('PPG').

National Planning Policy Framework

- 2.2 The NPPF has 13 key objectives which are:

1. Delivering a sufficient supply of homes
2. Building a strong, competitive economy
3. Ensuring the vitality of town centres
- 4 Promoting healthy and safe communities
5. Promoting sustainable transport
6. Supporting high quality communications
7. Making effective use of land
8. Achieving well-designed places
9. Protecting Green Belt land
10. Meeting the challenge of climate change, flooding and coastal change
11. Conserving and enhancing the natural environment
12. Conserving and enhancing the historic environment
13. Facilitating the sustainable use of minerals

- 2.3 This statement explains how the Plan contributes to meeting these objectives and also notes the specific national policies that the Plan is intended to support and supplement.

- 2.4 The Plan has three objectives. These are summarised in Table 2.1 alongside the NPPF goals that each objective seeks to address.

Table 2.1: Assessment of the Spitalfields NP objectives against NPPF goals

Plan objective	Relevant NPPF goal
Objective 1: To provide as much greenery as possible in this deeply urban area	<ul style="list-style-type: none"> • Conserving and enhancing the natural environment • Meeting the challenge of climate change, flooding and coastal change
Objective 2: To protect and enhance the historic built environment	<ul style="list-style-type: none"> • Conserving and enhancing the historic environment • Achieve well-designed places
Objective 3: To maintain the special and diverse business mix that has settled in the area whilst maximising the employment opportunities that result from the neighbourhood's prime location and to support the small scale creative and artisan businesses that have always been part of the Spitalfields story	<ul style="list-style-type: none"> • Building a strong, competitive economy • Ensuring the vitality of town centres

2.5 Table 2.2 sets out each policy of the Plan alongside the policies in the NPPF that it has had regard to and analyses how each Plan policy contributes to achieving the key objectives of the NPPF.

Table 2.2: Assessment of how each policy in the Spitalfields NP conforms to the NPPF

Policy Title and Reference	NPPF Reference (paragraph)	Commentary
POLICY SPITAL1: PROTECTING THE PHYSICAL FABRIC OF SPITALFIELDS	125, 126, 127, 185, 188	This policy contributes to the NPPF requirement of achieving well designed places and conserving the historic environment. The policy encourages development to reflect the character of each of the specific parts of the area, as well as to preserve archaeological assets and non-designated heritage assets.
POLICY SPITAL2: LAND USE, ACTIVITIES AND FRONTAGES	80, 81, 185	This policy contributes to the NPPF requirements of ensuring the vitality of town centres, building a strong and competitive economy and conserving the historic environment. The policy seeks to preserve the balance of uses and features of individual ground floor commercial units that are part of what makes Spitalfields a special place where small businesses can thrive.
POLICY SPITAL3: PUBLIC REALM	91, 95, 96, 118, 124, 125, 127	This policy contributes to the NPPF requirements of achieving well designed places, promoting healthy and safe communities and conserving the historic environment. It seeks to preserve the public realm that makes Spitalfields unique and to encourage the provision of high quality public realm as part of new development.

Policy Title and Reference	NPPF Reference (paragraph)	Commentary
POLICY SPITAL4: FACILITATING URBAN GREENING	91, 96, 148, 149, 150 170	This policy contributes to the NPPF requirements of meeting the challenge of climate change and conserving and enhancing the natural environment. It requires development to ensure urban greening is achieved by development and that the network of green corridors are enhanced.
POLICY SPITAL5: LOCAL GREEN SPACES	99, 100, 101, 106	National policy enables local communities to identify, for special protection, green areas of importance to them known as Local Green Spaces. This policy designates 5 areas, identified by the local community as important, as Local Green Spaces which will be protected.
POLICY SPITAL6: RAM AND MAGPIE SITE	91, 92, 96, 97	This policy contributes to the NPPF requirements of promoting healthy and safe communities and conserving and enhancing the natural environment. The policy seeks to ensure that open space used informally by a valued community facility is retained and enhanced for that use.
POLICY SPITAL7: AFFORDABLE WORKSPACE	80, 81, 82	This policy contributes to the NPPF requirement of building a strong, competitive economy. It seeks to provide affordable workspace for the core of businesses that make up the economy of Spitalfields, namely micro-businesses.

3 BASIC CONDITION (IV) – CONTRIBUTION TO SUSTAINABLE DEVELOPMENT

- 3.1 The NPPF states in paragraph 11 that a presumption in favour of sustainable development is at the heart of the NPPF.
- 3.2 For the Plan, sustainable development has been the fundamental basis of each of its policies. The National Planning Practice Guidance advises that ‘sufficient and proportionate evidence should be presented on how the draft neighbourhood plan ... guides development to sustainable solutions’. The evidence base presented alongside the Plan, coupled with the reasoned justification for each policy in the Plan, demonstrates how the Plan guides development towards sustainable solutions.
- 3.3 Table 3.1 below summarises how the objectives and policies in the Plan contribute towards sustainable development, as defined in the NPPF. Many of the objectives of the Plan overlap the three strands of sustainability, so for the purposes of this document, the most relevant strand has been taken to illustrate conformity.

Table 3.1: Assessment of Spitalfields Neighbourhood Plan objectives and policies against sustainable development

Deliver economic sustainability	
NPPF definition – ‘to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.’	
SPITALFIELDS NP Objectives	To maintain the special and diverse business mix that has settled in the area whilst maximising the employment opportunities that result from the neighbourhood’s prime location and to support the small scale creative and artisan businesses that have always been part of the Spitalfields story.
SPITALFIELDS NP Policies	POLICY SPITAL7: AFFORDABLE WORKSPACE
Commentary	<p>The NPPF seeks to secure economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meet the twin challenges of global competition and of a low carbon future.</p> <p>The Plan seeks to contribute to the delivery of this national aim by ensuring there is sufficient affordable workspace for micro businesses that form the heart of the economy of Spitalfields. Many of these businesses play a vital local role in providing jobs and services for the local community. If they cannot afford the rent for business space locally then they and the value they bring will be lost to Spitalfields.</p>

Deliver social sustainability	
NPPF definition – ‘to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.’	
SPITALFIELDS NP Objectives	To protect and enhance the historic built environment
SPITALFIELDS NP Policies	<p>POLICY SPITAL1: PROTECTING THE PHYSICAL FABRIC OF SPITALFIELDS</p> <p>POLICY SPITAL2: LAND USE, ACTIVITIES AND FRONTAGES</p> <p>POLICY SPITAL3: PUBLIC REALM</p> <p>POLICY SPITAL5: LOCAL GREEN SPACES</p> <p>POLICY SPITAL6: RAM AND MAGPIE SITE</p>
Commentary	<p>One of the key objectives in the NPPF is to conserve and enhance the historic environment, which incorporates social sustainability. The preservation of the rich heritage of Spitalfields is reflected in Policy SPITAL1 and the accompanying Local Character Area Appraisals and identification of Non-Designated Heritage Assets. This is supported by SPITAL2 which seeks to retain the frontages, signage and features that contribute towards that rich heritage.</p> <p>Policy SPITAL3 preserves the key aspects of the public realm that help to make Spitalfields such a vibrant place.</p> <p>Policy SPITAL5 protects a number of local green spaces that are of importance to the community because of the public green space they provide, which is vital in an inner London setting.</p> <p>Policy SPITAL6 recognises the importance of the Spitalfields City Farm to the community and seeks to protect the adjacent land for its future needs.</p>

Deliver environmental sustainability	
NPPF definition – ‘to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.’	
SPITALFIELDS NP Objectives	To provide as much greenery as possible in this deeply urban area
SPITALFIELDS NP Policies	POLICY SPITAL4: FACILITATING URBAN GREENING POLICY SPITAL5: LOCAL GREEN SPACES POLICY SPITAL6: RAM AND MAGPIE SITE
Commentary	The natural environment and addressing climate change is of key importance to Spitalfields and its community. Policy SPITAL4 seeks to ensure that new development provides as much urban greening as possible. Policies SPITAL5 and 6 seek to protect the green space there already is, with SPITAL6 seeking to ensure that the use of once piece of green space is for the benefit of a much-valued local community facility, Spitalfields City Farm.

- 3.4 As demonstrated in Table 3.1, the strategic objectives of the Plan are considered to comprise a balance of social, economic and environmental goals. The policies in the Plan demonstrably contribute to achieving well-designed places, promoting a healthy and safe community, conserving and enhancing the historic environment, meeting the challenge of climate change and building a strong, competitive economy.

4 BASIC CONDITION (V) – GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN

- 4.1 The development plan currently consists of the following:
- 2019 Tower Hamlets Local Plan
 - 2016 London Plan
- 4.2 The London Plan review has reached a very advanced stage, having passed examination and been declared sound. The 2019 'Intend to Publish' version of the London Plan is therefore also included in the assessment.
- 4.3 Table 4.1 details the Spitalfields NP policies alongside a consideration of how they are in general conformity with the strategic policies in the Tower Hamlets Local Plan, the London Plan and the 'Intend to Publish' version of the London Plan. Where it is not clear whether a policy is strategic, a judgment has been made. Equally, there are a number of strategic policies in these documents which are not considered relevant to any of the policies in the Neighbourhood Plan. In such cases, these strategic policies have not been included.
- 4.4 Where a policy is not identified in Table 4.1, it is considered that the Neighbourhood Plan does not contain any policies that directly relate to it.

Table 4.1: Assessment of conformity with development plan strategic policies

Strategic Policy	Spitalfields NP policy
London Plan 2016	
POLICY 2.18 GREEN INFRASTRUCTURE: THE MULTI FUNCTIONAL NETWORK OF GREEN AND OPEN SPACES	Policy SPITAL4 seeks to enhance the quality and accessibility of the Green Grid network.
POLICY 3.2 IMPROVING HEALTH AND ADDRESSING HEALTH INEQUALITIES	Policy SPITAL4 seeks to maximise urban greening of development and Policy SPITAL7 seeks to ensure that the diverse economy of Spitalfields can survive.
POLICY 4.1 DEVELOPING LONDON'S ECONOMY	Policy SPITAL7 seeks to ensure that the diverse economy of Spitalfields can survive.
POLICY 4.12 IMPROVING OPPORTUNITIES FOR ALL	Policy SPITAL7 seeks to ensure that the small businesses which can provide jobs for local people and provide wider opportunities can thrive.
POLICY 5.10 URBAN GREENING	Policy SPITAL4 seeks to maximise urban greening of development.
POLICY 7.3 DESIGNING OUT CRIME	Policy SPITAL3 seeks to ensure that the design of new public realm does not materially increase the risk of crime.
POLICY 7.4 LOCAL CHARACTER	Policy SPITAL1 and the accompanying Local Character Area Appraisals seeks to define the local character of each area and ensure development is informed by this. Policy SPITAL2 requires signage and local features of significance to be retained.
POLICY 7.5 PUBLIC REALM	Policy SPITAL3 encourages the delivery of a high quality public realm.
POLICY 7.6 ARCHITECTURE	Policy SPITAL1 and the accompanying Local Character Area Appraisals seeks to define the local character of each area and ensure development is informed by this. Policy SPITAL2 requires signage and local features of significance to be retained.
POLICY 7.8 HERITAGE ASSETS AND ARCHAEOLOGY	Policy SPITAL1 seeks to ensure that non-designated heritage assets and archaeological assets are addressed appropriately.
POLICY 7.18 PROTECTING OPEN SPACE AND ADDRESSING DEFICIENCY	Policy SPITAL5 protects a number of local green spaces of value.
POLICY 7.19 BIODIVERSITY AND ACCESS TO NATURE	Policy SPITAL4 seeks to enhance the quality and accessibility of the Green Grid network.

Spitalfields Neighbourhood Plan
Basic Conditions Statement

Strategic Policy	Spitalfields NP policy
London Plan 'Intend to Publish' version, 2019	
GG3 Creating a healthy city	Policy SPITAL4 seeks to enhance the quality and accessibility of the Green Grid network. Policy SPITAL5 protects a number of local green spaces of value. Policy SPITAL6 seeks to ensure that a valued community group can have continued access to open space for their activities.
GG5 Growing a good economy	Policy SPITAL7 seeks to ensure that the diverse economy of Spitalfields can survive.
GG6 Increasing efficiency and resilience	Policy SPITAL4 seeks to maximise urban greening of development.
Policy D8 Public realm	Policy SPITAL3 encourages the delivery of a high quality public realm.
Policy E2 Providing suitable business space Policy E3 Affordable workspace	Policy SPITAL7 seeks to ensure that the diverse economy of Spitalfields can survive through the provision of affordable workspace.
Policy HC1 Heritage conservation and growth	Policy SPITAL1 seeks to ensure that non-designated heritage assets and archaeological assets are addressed appropriately.
Policy G4 Open space	Policy SPITAL5 protects a number of local green spaces of value.
Policy G5 Urban greening	Policy SPITAL4 seeks to maximise urban greening of development.
Policy G6 Biodiversity and access to nature	Policy SPITAL4 seeks to enhance the quality and accessibility of the Green Grid network.
Policy G8 Food growing	Policy SPITAL6 seeks to ensure that a local community farm can expand and thrive.
Tower Hamlets Local Plan 2019	
Policy S.DH1: Delivering high quality design	Policy SPITAL1 seeks to ensure good quality design that reflects the character and heritage of each of the Character Areas.
Policy D.DH2: Attractive streets, spaces and public realm	Policy SPITAL3 encourages the delivery of a high quality, safe public realm.
Policy S.DH3: Heritage and the historic environment	Policy SPITAL1 seeks to ensure that non-designated heritage assets and archaeological assets are addressed appropriately.

Spitalfields Neighbourhood Plan
Basic Conditions Statement

Strategic Policy	Spitalfields NP policy
Policy D.DH9: Shopfronts	Policy SPITAL2 requires signage and local features of significance to be retained.
Policy D.EMP2: New employment space	Policy SPITAL7 seeks to encourage the expansion of the diverse economy of Spitalfields through the provision of affordable workspace.
Policy D.OWS3: Open space and green grid networks	Policy SPITAL4 seeks to enhance the quality and accessibility of the Green Grid network. Policy SPITAL5 protects a number of local green spaces of value.
Policy D.ES3: Urban greening and biodiversity	Policy SPITAL4 seeks to maximise urban greening of development.

5 BASIC CONDITION (VI) – CONFORMITY WITH EU OBLIGATIONS

- 5.1 The Plan and the process under which it was made conforms to the Strategic Environmental Assessment (SEA) Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 5.2 In June 2020, when the draft SNP was submitted to Tower Hamlets Borough Council (THBC) for informal comment, a request was made for a screening opinion on the need for a Strategic Environmental Assessment (SEA). Following amendments made to the Plan ready for Regulation 14 Consultation, the screening assessment was undertaken by THBC who consulted the appropriate statutory bodies (Environment Agency, Natural England and Historic England). In light of this, the assessment concluded that the draft SNP was not likely to have a significant impact on the environment, therefore an SEA was not needed. The Screening Report by THBC is included as part of the supporting evidence base to the Plan.
- 5.3 Following Regulation 14 Consultation, minor amendments were made to the Plan. No new policies were added and there were no material changes to policies such that this would change the overall outcome of the screening opinion.
- 5.4 In addition to conforming to its EU obligations, the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights.

6 BASIC CONDITION (VII) – CONFORMITY WITH THE PRESCRIBED CONDITIONS

- 6.1 Under Directive 92/43/EEC, also known as the Habitats Directive², it must be ascertained whether the draft Plan is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulation Assessments (HRA). An Appropriate Assessment is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether or not it is necessary to undertake an assessment, a screening process is followed.
- 6.2 In June 2020, when the draft SNP was submitted to Tower Hamlets Borough Council (THBC) for informal comment, a request was made for a screening opinion on the need for an HRA. This was undertaken by THBC who consulted the appropriate statutory body (Natural England). In light of this, the assessment concluded that the draft SNP was not likely to have a significant impact on European protected species or sites, therefore an HRA was not needed. The Screening Report by THBC is included as part of the supporting evidence base to the Plan.
- 6.3 The Screening Reports including the responses from the statutory body have been submitted at Regulation 16 stage as part of the evidence base for the Plan.

² Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>.

7 CONCLUSION

- 7.1 The relevant Basic Conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the Spitalfields Neighbourhood Plan and all the policies therein. It is therefore respectfully suggested to the Examiner that the Spitalfields Neighbourhood Plan complies with Paragraph 8(1) (a) of Schedule 4B of the Act.

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Equality Impact Analysis Initial Screening Tool

Section 1.0: Background Information

Name of Completing Officer:	Steven Heywood
Date of Initial Screening:	02/11/2020
Service Area & Directorate:	Strategic Planning, Place
Head of Service:	Ann Sutcliffe

Section 2.0: Summary of policy, proposal or activity being screened

Name of policy, proposal or activity:
Spitalfields Neighbourhood Plan – Validation of Submission
What are the aims / objectives of the policy, proposal or activity?
<p>To validate the submission of the Spitalfields Neighbourhood Plan to the Council and confirm that the plan should proceed to consultation and independent examination. The Spitalfields Neighbourhood Plan contains policies on protection of heritage assets, green space and urban greening projects, and the delivery of affordable workspace.</p>



Section 3.0: Equality Impact Analysis Test:

Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below ? Please consider the impact on overall communities, residents and Council employees. This should include people of different:	Yes	No	Comments :
<ul style="list-style-type: none"> ▪ Sex 		X	
<ul style="list-style-type: none"> ▪ Age 		X	
<ul style="list-style-type: none"> ▪ Race 		X	
<ul style="list-style-type: none"> ▪ Religion or Philosophical belief 		X	
<ul style="list-style-type: none"> ▪ Sexual Orientation 		X	
<ul style="list-style-type: none"> ▪ Gender re-assignment status 		X	
<ul style="list-style-type: none"> ▪ People who have a Disability (Physical, learning difficulties, mental health and medical conditions) 		X	
<ul style="list-style-type: none"> ▪ Marriage and Civil Partnerships status 		X	
<ul style="list-style-type: none"> ▪ People who are Pregnant and Maternity 		X	
<p>You should also consider:</p> <ul style="list-style-type: none"> ▪ Parents and Carers ▪ Socio and Economic status ▪ People with different Gender Identities e.g. Gender fluid, Non Binary etc. 		X	

If you have answered **Yes** to one or more of the groups of people listed above, **a full Equality Impact Assessment is required.**

The only exceptions to this are listed in sections 5.1 and 5.2 of this document.



Section 4.0: Justifying Discrimination:

Are all risks of inequalities identified capable of being justified because there is a: ✓

(i) *Genuine Reason* for implementation

(ii) The activity represents a *Proportionate Means* of achieving a *Legitimate Council Aim*

(iii) There is a *Genuine Occupational Requirement* for the council to implement this activity

Section 5.0: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

5.1 The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.

5.2 Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

5.3 Conclusion Details:

5.4 Do you recommend a fully Equality Impact Analysis is performed ?

Yes

No

5.5 Reasons a full Equality Impact Analysis is not required:

This proposal relates only to the process of confirming whether the Spitalfields Neighbourhood Plan meets the submission requirements as set out in the Neighbourhood Planning (General) Regulations 2012 and the Town and Country Planning Act 1990. The decision will allow the neighbourhood plan to proceed for further consideration, but does not lead directly to the implementation of any of the proposals in the plan. The policies in the neighbourhood plan are not expected to have an impact on groups with protected characteristics.

If you have answered **YES** to this question, please proceed to section 6.0 Sign Off.

If you have answered **NO** to this question, please detail your reasons in section 5.5 (across) before proceeding to section 6.0 Sign Off.



Section 6.0: Sign Off:

Signed *Marissa Ryan-Hernandez* Date: 09.11.20.....

Name:Marissa Ryan-Hernandez..... Position:Team Leader ...

Planning and Building Control
Place Directorate
London Borough of Tower Hamlets
Mulberry Place
Clove Crescent
London E14 2BG

12 October 2020

Dear James Frankcom,

Re: SEA and HRA Screening Determination of the Spitalfields Neighbourhood Plan

This letter sets out the Council's screening opinion concerning the need for a Strategic Environmental Assessment (SEA) or Habitats Regulation Assessment (HRA) in relation to the Spitalfields Neighbourhood Plan, version dated July 2020.

On the basis of the contents of the neighbourhood plan, and on consultation with the statutory bodies (Environment Agency, Natural England, Historic England), the following determination is made: **an SEA and HRA of the Spitalfields Neighbourhood Plan is not required.**

The reasons for this decision are set out in the accompanying Statement of Reasons, which includes the comments made by the statutory consultees.


This decision has been based on the information provided in the version of the neighbourhood plan dated July 2020. If the content of the neighbourhood plan significantly changes and/or there is a material change in the environmental characteristics of the locality, then this determination may be revisited to take account of those changes.

A copy of this Determination Letter and the Statement of Reasons will be made available on the Council's website (https://www.towerhamlets.gov.uk/ignl/planning_and_building_control/planning_policy_guidance/neighbourhood_planning/neighbourhood_planning.aspx).

Kind regards,

Marissa Ryan-Hernandez
Plan Making Team Leader
Planning & Building Control
London Borough of Tower Hamlets

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<p>Cabinet</p> <p>16 December 2020</p>	
<p>Report of: Ann Sutcliffe, Corporate Director Place</p>	<p>Classification: Unrestricted</p>
<p>Local Government and Social Care Ombudsman, Determination of Outcome</p>	

Lead Member	Dan Tomlinson, Cabinet Member for Public Realm
Originating Officer(s)	Mick Darby, Head of Parking
Wards affected	All Wards
Key Decision?	No
Forward Plan Notice Published	25 November 2020
Reason for Key Decision	This report has been reviewed as not meeting the Key Decision criteria.
Strategic Plan Priority / Outcome	A borough that our residents are proud of and love to live in;

Executive Summary

The Local Government and Social Care Ombudsman issued a Report finding fault with the way in which Mrs B’s application for a Personalised Disabled Bay for her son was dealt with by the council. The Ombudsman found there was significant fault in the handling of Mrs B’s case causing her injustice.

The Council is in agreement with the Ombudsman recommendations and has taken steps to remedy the injustice these faults can cause disabled people.

Recommendations:

The cabinet is recommended to:

1. Note the content of the report
2. Note the actions being taken by Parking Services to remedy the situation

1 REASONS FOR THE DECISIONS

- 1.1 The Council accepts the Local Government Ombudsman’s findings and will implement the recommendations made.

2 ALTERNATIVE OPTIONS

- 2.1 The Council does not wish to challenge the decision of the Local Government Ombudsman, which is the only alternative option available.

3 DETAILS OF THE REPORT

- 3.1 The Commission for Local Administration in England, commonly known as the local Government Ombudsman (LGO), was established under the Local Government Act 1974 (amended by the Local Government and Housing Act 1989) to consider complaints against local authorities and other public bodies. Their remit is broad and covers actions of the authority that fall under the corporate complaint's procedure, statutory Adults Social Care complaints and statutory Children's Social Care complaints. The notable exception to their remit, since April 2011, is non-strategic housing complaints which are considered by the Housing Ombudsman.
- 3.2 Since 2013, arising from the Local Government and Public Involvement in Health Act 2007, the LGO has issued and published either a 'statement of reasons' or 'report' of their findings for each complaint.
- 3.3 Over and above this requirement, complaints to the Council where fault (or maladministration) is found and a formal report against the council is issued, should also be considered by Cabinet (executive functions) and full Council (non-executive functions).

Summary

- 3.4 This complaint relates to a personalised disabled parking bay application. Mrs B complained that the Council was wrong to refuse her son, C, as C has autism, severe behavioural difficulties, physical problems as a result of a birth defect which cause muscle weakness, and asthma. Although he has a Blue Badge, the family frequently have to park far from their home and have great difficulty transferring C between the car and their home. This can also be very distressing for C. Mrs B says that C needs a personalised disabled bay so that they can safely transfer him between his special need's pushchair and their car.

Findings: The Council was at fault when it:

- 3.5 With regard to the Blue Badge application, the decision letter did not give clear reasons for refusal of the Blue Badge as set out in the guidance. It also did not give any reasons why it had changed its decision and awarded a Blue Badge.
- 3.6 Should have explained that it had awarded a Blue Badge on a discretionary basis, having regard to the assessor's observations of the extreme difficulty experienced by the family. Had it done so; Mrs B would have been able to put this forward in support of her parking bay application.

- 3.7 Councils must also not unreasonably fetter their discretion, i.e. they must allow for occasions where the specific circumstances of a case make it appropriate for them to depart from the general terms of their policy. Aside from that general discretion, the Council's parking bay policy also allows for exceptions to its policy where *"the applicant requires constant attendance, or the driver is unable to handle required medical apparatus in addition to the applicant"*.
- 3.8 The extensive correspondence on this case did not show any evidence that the Council considered C's application properly under the *"exception"* clause in the policy. Moreover, the Council dismissed C's award of higher rate mobility DLA as being a lower threshold than its own criteria without either seeking further clarification of the basis for that award or properly considering its implications.
- 3.9 There are very specific circumstances under which higher rate mobility DLA can be awarded and the threshold is very high. It is clear that C does not meet the first five criteria for an award of higher rate mobility DLA. So, logically, it follows that C's award must have been made under either the *"severe mental impairment"* criteria or on the basis that C is *"virtually unable to walk"* due to a physical disability. The award of higher rate mobility DLA was directly relevant to Mrs B's appeal and should have been explored further in that the Tribunal had determined either that C was *"virtually unable to walk"* or that he *"requires constant attendance"*. We also consider that the Council's dismissal of that award as being of a lower threshold than the Council's own mobility criteria suggests a lack of consideration of the implications of such an award.

4 Action

- 4.1 To remedy the injustice to C and his family, the Council has agreed, within one month of the decision date of the report to:
- pay the family £1,000 to reflect the significant distress and inconvenience caused as a result of the delay installing a parking bay;
 - ensure that officers are aware of the implications of an award of higher rate mobility Disability Living Allowance and that decisions relating to parking bay applications take into account both the exceptions in its policy and the Council's general discretion; and
 - ensure that decision letters on both Blue Badge and parking bay applications contain sufficient information to enable the applicant to clearly understand the reasons for that decision.
- 4.2 Within three months of the decision date of this report, it will:
- install a parking bay for C;
 - review its parking bay policy, having regard to how it should take into account hidden disabilities; and

- then write to those applicants who have been refused a parking bay over the past year and inform them of the changes to its policy.
- 4.3 Some remedial tasks have already been carried out and Parking and Mobility Services have put in place measures to meet all recommended actions.

5 EQUALITIES IMPLICATIONS

- 5.1 One of the recommendations by the Ombudsman was for the Council to Review its parking bay policy, having regard to how it should take into account hidden disabilities. The policy has been reviewed by the Parking team to ensure hidden disabilities are taken into account.
- 5.2 It was also suggested by the Ombudsman for the Parking team to write to those applicants who have been refused a parking bay over the past year and inform them of the changes to its policy, which also has been completed.

6 OTHER STATUTORY IMPLICATIONS

- 6.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
 - Consultations,
 - Environmental (including air quality),
 - Risk Management,
 - Crime Reduction,
 - Safeguarding.
 - Data Protection / Privacy Impact Assessment.

- 6.2 There are no other statutory implications

7 COMMENTS OF THE CHIEF FINANCE OFFICER

- 7.1 There are no material financial implications emanating from this report. All costs associated with compensating the family, installing the disabled parking space and reviewing policies surrounding hidden disabilities will be contained within existing budget provision.

8 COMMENTS OF LEGAL SERVICES

- 8.1 The Executive (Mayor and Cabinet as defined in section 9(c) of *the Local Government Act 2000*) is authorised to note the proposed recommendations in this report as these comprise a 'Key Decision' as defined in Section 3 of the Council's Constitution. Paragraph 6 of Section 3 of the Constitution defines 'Key Decision' as an executive decision which is likely to be significant in terms of its effects on communities living or working in an area comprising two

or more wards or electoral divisions. Once implemented, the recommendations in this report are likely to have a significant effect on members of the public in the borough who are in the same circumstances as the complainant.

8.2 The functions and duties of the Local Government and Social Care Ombudsman ('the Ombudsman') are set out in the Local Government Act 1974 ('the Act'). The Act sets out the statutory functions of the Ombudsman, which include the authority to:

- 8.1.2 Investigate complaints against councils and some other authorities;
- 8.2.2 Investigate complaints about adult social care providers from people who arrange or fund their own adult social care; and
- 8.3.2 Provide advice and guidance on good administrative practice.

8.3 Under s26A or s34B of the Act member of the public who claims to have sustained injustice in relation to a matter can make a complaint to the Ombudsman.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Draft report by the Local Government and Social Care Ombudsman

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None

Officer contact details for documents:

Mick Darby, Head of Parking

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**Draft report by the Local Government and Social Care
Ombudsman**

**Investigation into a complaint against
The London Borough of Tower Hamlets
(reference number: 19 006 122)**

**** August 2020**

The Ombudsman's role

For 40 years the Ombudsman has independently and impartially investigated complaints. We effectively resolve disputes about councils and other bodies in our jurisdiction by recommending redress which is proportionate, appropriate and reasonable based on all the facts of the complaint. Our service is free of charge.

Each case which comes to the Ombudsman is different and we take the individual needs and circumstances of the person complaining to us into account when we make recommendations to remedy injustice caused by fault.

We have no legal power to force councils to follow our recommendations, but they almost always do. Some of the things we might ask a council to do are:

- > apologise
- > pay a financial remedy
- > improve its procedures so similar problems don't happen again.

Section 30 of the 1974 Local Government Act says that a report should not normally name or identify any person. The people involved in this complaint are referred to by a letter or job role.

Key to names used

Mrs B	The complainant
C	Her son

Draft report summary

School transport

Mrs B complains that the Council was wrong to refuse her son, C, a personalised disabled parking bay. C has autism, severe behavioural difficulties, physical problems as a result of a birth defect which cause muscle weakness, and asthma. Although he has a Blue Badge, the family frequently have to park far from their home and have great difficulty transferring C between the car and their home. This can also be very distressing for C. Mrs B says that C needs a personalised disabled bay so that they can safely transfer him between his special needs pushchair and their car.

Finding

Fault found causing injustice and recommendations made.

Recommendations

To remedy the injustice to C and his family, we recommend that the Council within three months:

- install a parking bay for C;
- pay the family £1,000 to reflect the significant distress and inconvenience caused as a result of the delay installing a parking bay;
- review its parking bay policy within three months having regard to how it should take into account hidden disabilities;
- once it has reviewed its policy, write to those applicants who have been refused a parking bay over the past year and inform them of the changes to its policy;
- ensure that officers are aware of the implications of an award of higher rate mobility DLA and that decisions relating to parking bay applications take into account both the exceptions in its policy and the Council's general discretion; and
- ensure that decision letters on both Blue Badge and parking bay applications contain sufficient information to enable the applicant to clearly understand the reasons for that decision.

The complaint

1. Mrs B complains that the Council was wrong to refuse her son, C, a personalised disabled parking bay. C has autism, severe behavioural difficulties, physical problems as a result of a birth defect which cause muscle weakness, and asthma. Although he has a Blue Badge, the family frequently have to park far from their home and have great difficulty transferring C between the car and their home. This can also be very distressing for C. Mrs B says that C needs a personalised disabled bay so that they can safely transfer him between his special needs pushchair and their car.

Legal and administrative background

The Ombudsman's role and powers

2. We investigate complaints of injustice caused by “*maladministration*” and “*service failure*”. I have used the word “*fault*” to refer to these. We cannot question whether a council's decision is right or wrong simply because the complainant disagrees with it. We must consider whether there was fault in the way the decision was reached. If there has been fault which has caused an injustice, we may suggest a remedy. (*Local Government Act 1974, sections 26(1), 26A(1) and 34(3), as amended*)

Blue Badges

3. The Blue Badge scheme was introduced by the Chronically Sick and Disabled Persons Act 1970. It allows people with disabilities to park closer to their destinations.
4. In 2014, the Department for Transport issued guidance to councils when providing Blue Badges to disabled people with severe mobility problems. The guidance provides a structured functional mobility assessment. The guidance is non-statutory, so councils are not legally obliged to adopt it. In practice, however, most councils do follow it. The 2014 guidance was replaced by new guidance with effect from August 2019. The main change was the introduction of assessment criteria to help people with severe mobility problems caused by non-visible (“*hidden*”) disabilities.
5. The guidance sets out two types of eligibility criteria for issuing Blue Badges:
 - Eligible without further assessment. This includes people over two years old and within one of several categories, including people receiving the Higher Rate of the Mobility Component of the Disability Living Allowance.
 - Eligible subject to further assessment. This includes people over two years old who fall within a range of descriptions. These include having been certified by an expert assessor as: having an enduring and substantial disability which causes them to be unable to walk; having very considerable difficulty whilst walking, which may include very considerable psychological distress; being at risk of serious harm when walking; or posing, when walking, a risk of serious harm to any other person.
6. Sections 6.9 and 6.10 of the guidance state:

“Regulation 8(3) of the 2000 Regulations states that where a local authority receives an application for a badge and refuses to issue one, it must let the applicant know in writing why their application was refused. The DfT strongly recommends that every applicant who is refused a badge should be given a detailed explanation of the grounds for refusal.”

“It is not sufficient to simply state that the applicant did not meet the eligibility criteria. The Local Government Ombudsman expects authorities to provide a clear explanation of the reasons why an application has been refused in the decision letter...”

7. The Council uses an independent disability consultancy to undertake mobility assessments based on a standard template form where points are awarded based on a range of factors as reported by the applicant or observed by the assessor.
8. An applicant needs to score 24 points to be eligible for a Blue Badge, though the form also provides space for the assessor to recommend a Blue Badge on a discretionary basis.

Personalised Disabled Bays

9. The Council may also choose to provide a personalised disabled parking bay (we refer to this in this report as a parking bay). The Council’s website explains that:

“Residents with severe disabilities may be eligible to apply for a disabled-parking bay near their home. Personalised Disabled bays may be considered in extreme circumstances for Blue Badge holders that can only walk a very short distance in a highly congested street, with no other forms of parking available.”

“Permits will generally only be issued to disabled drivers and are vehicle- and bay-specific.”

10. There is no national guidance in respect of parking bays but the Council’s eligibility criteria are set out in its Disabled Person’s Parking Policy.
11. The Council’s parking bay eligibility criteria state:

“An application may be declined if it does not meet all [the relevant] eligibility criteria.

a) The applicant must have no off-street parking space available, e.g. a driveway, a garage or a housing estate with bays that can be allocated to the applicant.

b) Parking stress in the area must be so severe that a parking space in close proximity to the applicant’s home cannot be found for a major part of most days...

d) In the case of a passenger (i.e. where the applicant cannot or does not drive), that the driver is unable to:

- park in the road to allow the applicant out; or
- push a wheelchair from the nearest available parking space, which is an unreasonable distance away.

Exceptions may be made to this criterion if:

- the applicant requires constant attendance or the driver is unable to handle required medical apparatus in addition to the applicant;
- the driver of the vehicle resides at the same address as the applicant; and
- the vehicle is used primarily for the purpose of transporting the applicant.

The Nominated Driver must live at the same address as the Applicant.”

-
12. The criteria also state:

“Passengers will not normally qualify as a driver is expected to park as necessary to assist the disabled passenger to their home and move the vehicle afterwards. Although this may entail short-term obstruction of the highway, this is considered necessary and is therefore unlikely to be considered to be a contravention.”

13. As with applications for a Blue Badge, the Council uses an independent disability consultancy to undertake mobility assessments based on a standard template form. The form is the same as that for Blue Badge applications with two exceptions – the form includes a section on the use of mobility equipment but it does not include a section whereby the assessor can recommend the exercise of discretion.
14. An applicant needs to score 33 points to be eligible for a parking bay. The level was previously set at 24 points but the Council has explained that there are currently approximately 25,000 on-street parking spaces in the borough and over 6,000 Blue Badge holders. It says it would be unsupportable to provide approximately 24% of the total available on-street parking space to individual Blue Badge holders in the borough. Moreover, the Department for Transport estimates that, as a result of the recent changes to take account of hidden disabilities, the number of Blue Badge holders is likely to increase by between 6% and 30%.
15. The Council is currently undertaking a full review of its parking bay scheme to update the terms, conditions, and eligibility criteria.

Disability Living Allowance for children

16. Disability Living Allowance (DLA) is a benefit payable to children with disabilities who meet certain criteria. DLA is split into two “*components*” - mobility and care. The mobility component of DLA can be paid at two different rates – lower and higher. The higher rate mobility component of DLA (higher rate mobility DLA) gives an automatic entitlement to a Blue Badge.
17. The criteria for higher rate mobility DLA are set out in legislation. The Department for Work and Pensions and the appeal tribunals can only award higher rate mobility DLA if a child fits the criteria. They cannot issue discretionary awards.
18. There are seven ways to qualify for high rate mobility:
- 1) The child is unable to walk due to a physical disability.
 - 2) The child is deaf and blind.
 - 3) The child has no legs or feet.
 - 4) The child is blind or severely visually impaired.
 - 5) The exertion needed to walk would lead to a danger to life or serious deterioration in the child’s health. This does not apply to children whose behaviour causes danger.
 - 6) The child meets the “*severe mental impairment*” criteria.
 - 7) The child is “*virtually unable to walk*” due to a physical disability.

How we considered this complaint

19. We produced this draft report after examining the relevant documents and correspondence from the Council and the complainant. We have had discussions

with the complainant, made enquiries of the Council and considered the comments it provided in response. We have also had regard to the relevant law.

20. We have given the complainant and the Council a confidential draft of this report and invited their comments. The comments received will be taken into account before deciding whether to finalise the report.

What we found

What happened

21. Mrs B lives in a Housing Association property with her husband and their two children. Their son is of primary school age. He has physical problems causing muscle weakness as a result of a birth defect and asthma. He also has autism and severe behavioural difficulties. He has an Education, Health and Care Plan. The Housing Association has put up railings in front of Mr and Mrs B's home to keep C safe and prevent him running into the road.
22. In September 2017, Mrs B applied for a Blue Badge for C due to his behavioural problems. She explained that C sometimes refused to walk and needed to be carried and that they were awaiting a special needs pushchair for him. She explained that C also needed to be accompanied on safety grounds whenever he is out.
23. The Council arranged an independent mobility assessment for C in December 2017. The assessor observed that C was able to walk to a parked car 90m away with an almost normal gait. The assessor noted that C had not displayed physical limitations to his mobility and his other conditions did not appear to affect his mobility so as to meet the criteria for a Blue Badge. C received a score of 20, so the Council wrote to Mrs B and explained that C was ineligible for a Blue Badge.
24. Mrs B wrote to the Council again in April 2018. She explained that C was "a low-functioning autistic child". She explained that C frequently had meltdowns, would not move, and she could not lift him and this was why he had been offered a special needs pushchair.
25. A further mobility assessment was undertaken by a different assessor. C received a score of 19 in the assessment and so did not meet the eligibility criteria in terms of mobility. However, the assessor noted the following:

"[C] has very severe autistic spectrum disorder. His behaviour at assessment was disruptive and noisy. He has no verbal communication but does shout and make loud noises. He has been provided with a major buggy by the wheelchair service for long distances and to help manage his behaviour... He was brought in the car by both parents due to his strength and difficult behaviour - he uses specialist car seat/harness. Dad had to hold securely on walking from car to waiting area. Throughout assessment he was noisy and difficult to manage... At end of assessment, he walked back to car - dad held his arm firmly - [C] did not want to walk so had to be pulled along at times and encouraged to walk in direction required - he is very much at risk as he has no awareness of danger. It does appear very difficult for mum to manage him on her own - the major buggy provision from wheelchair service does indicate the restraint needed to manage his behaviour - he is however getting too big for his buggy and this is not a long term solution. Although he does not meet mobility criteria - OT to request further consideration on discretionary basis due to behavioural/management difficulties."

-
26. The assessor emailed the Council and explained that C did not meet the mobility criteria but noted that *“the whole of the building can vouch for the difficulties experienced by the family”*. She indicated that C’s support needs were among the highest that she had seen, expressed her great empathy for the family and asked whether the Council could consider a discretionary award of a Blue Badge. The Council agreed to do so and sent a letter confirming the award of a Blue Badge.
27. In July 2018, Mrs B applied for parking bay for C. The application referred to C’s medical conditions and explained that he was unaware of dangers and ran out into the road. He needed to walk straight to the car or he would likely have a meltdown. He needed to be safe when being transferred in and out of the car and his car door needed to face the pavement. He needed to see the front door of his house or he would not get out of the car. The family also needed to be able to transport his special needs pushchair.
28. There was a delay in arranging a mobility assessment until October 2018. The parking bay assessment was then undertaken by the first assessor who had undertaken the first Blue Badge assessment. On this occasion, C received a score of 24, which would be high enough for a Blue Badge but insufficient for a parking bay. The assessor concluded that C did not meet the eligibility criteria in terms of mobility, using most of the same wording as his previous assessment.
29. Mrs B appealed the decision at the start of November. An officer contacted Mrs B and understood that C was now reliant on the use of a wheelchair. Despite further contact, Mrs B received no updates until mid-January 2019 when a parking and mobility services officer wrote to her offering a reassessment for C, on the basis of a change in circumstances, i.e. full-time wheelchair use.
30. Mrs B contacted the officer and explained that C’s use of a wheelchair was no different to his previous use of a special needs pushchair, but they had changed to a wheelchair as C now weighed 30kg. She also provided a copy of a decision made by the First Tier Tribunal of the Social Entitlement Chamber to award C higher rate mobility DLA until 2024.
31. The officer noted that the use of the wheelchair was not a change of circumstances and that Mrs B did not want a further assessment. He said that the parking bay eligibility criteria were set at a higher level than those for DLA. Accordingly, the score of 24 points from the assessment stood and C was not entitled to a disabled bay.
32. Mrs B responded at the start of February. She said that C permanently needed to use and access his wheelchair. The wheelchair was large and their car was not adapted to store and transport it. She remained of the view that C met the eligibility criteria, said that C would have a further mobility assessment if that was necessary, and asked how to escalate her concerns.
33. In February 2019, the Council undertook a Child and Carer’s Assessment in relation to holiday support for Mr and Mrs B. The Social Worker noted that:
- “[C] does not have any sense of danger...”*
- “[C] dislikes to be forced to do anything, doesn’t like being told no, or being wet or cold. When this occurs, [C] tends to bang his head in retaliation and parents then struggle to calm him down.”*
- “He has 1:1 adult support throughout the day, including break times.”*

-
34. The Council considered Mrs B’s concerns as a complaint at the second stage of its procedures. The complaints officer liaised with the parking and mobility services officer to clarify the case.
35. The latter officer confirmed that the Council accepted that there was no off-street parking space available and that there was sufficient parking stress in the area to meet the eligibility criteria. He also referred to criterion (d) which applies to passengers, and stated:
- “On the face of it [C] is theoretically eligible under this criterion however the scheme is predicated on the disabled person having severe physical mobility issues, which is why we assess each applicant. C’s physical mobility assessment scored 24 out of 36, which demonstrates sufficient physical mobility not to be eligible.”*
36. The complaints officer contacted Mrs B in early March to apologise for the delay in dealing with her complaint. Mrs B reiterated the difficulties that the family had with C due to his severe behavioural problems and lack of sense of danger.
37. The complaints officer sought further clarification from the parking and mobility services officer who explained:
- “the decision as to whether a parking bay is approved or not is based solely on an applicant’s physical mobility and [C] is not the only applicant whom we have had to reject on the basis that his disability results from a mental condition rather than a physical one... Although I sympathise with Mrs [B], it would be unfair and inconsistent to change our decision in C’s case without having to reconsider not only the other parking bay cases that we have rejected but also potentially all the [Blue Badge] cases as well.”*
38. In accordance with the Council’s procedures, the Council’s Chief Executive responded to the Stage 2 complaint. The Stage 2 response reiterated the parking and mobility services officer’s comments that, on the face of it, C met the eligibility criteria but that the independent assessment had found that he did not meet the threshold in terms of mobility. It was felt that it would be unfair and inconsistent to change that decision.

Analysis

39. Before turning to the question of the Council’s consideration of the parking bay application, we note that the Council’s decision letters gave no clear reasons for refusal of the Blue Badge as set out in the guidance. It also gave no reasons why it had changed its decision and awarded a Blue Badge. We consider that to be fault.
40. We consider that the Council should have explained that it had awarded a Blue Badge on a discretionary basis, having regard to the assessor’s observations of the extreme difficulty experienced by the family. Had it done so, Mrs B would have been able to put this forward in support of her parking bay application.
41. As regards the Council’s parking bay policy, it is for the Council to determine whether to provide parking bays and to decide on the eligibility criteria. The Council has explained that it must balance the needs of a range of service users. In order to ensure that there is adequate general parking provision, it has chosen to set a higher threshold for the provision of parking bays than for the award of Blue Badges. We see no fault here.
42. However, when setting general policies, councils must also not unreasonably fetter their discretion, i.e. they must allow for occasions where the specific

circumstances of a case make it appropriate for them to depart from the general terms of their policy. Aside from that general discretion, the Council's parking bay policy also allows for exceptions to its policy where *"the applicant requires constant attendance or the driver is unable to handle required medical apparatus in addition to the applicant"*.

43. In this case, the Council has undertaken a mobility assessment in accordance with its procedures. The outcome of that assessment was that the score awarded to C's application did not meet the threshold for a parking bay. We see no fault in the way the assessment was carried out so we cannot question the score awarded.
44. However, the extensive correspondence on this case shows no evidence that the Council considered C's application properly under the *"exception"* clause in the policy. Moreover, the Council dismissed C's award of higher rate mobility DLA as being a lower threshold than its own criteria without either seeking further clarification of the basis for that award or properly considering its implications.
45. There are very specific circumstances under which higher rate mobility DLA can be awarded and the threshold is very high. It is clear that C does not meet the first five criteria for an award of higher rate mobility DLA. So, logically, it follows that C's award must have been made under either the *"severe mental impairment"* criteria, or on the basis that C is *"virtually unable to walk"* due to a physical disability.
46. To be awarded higher rate mobility DLA under criterion 6, on the basis of *"severe mental impairment"*, a child must meet all the following criteria:
- The child receives the higher rate DLA care component.
 - The child has *"a state of arrested development or incomplete physical development of the brain, which results in severe impairment of intelligence and social functioning"*.
 - The child *"exhibits disruptive behaviour"* which:
 - a) *"is extreme"*
 - b) *"regularly requires another person to intervene and physically restrain them to prevent them causing injury to themselves or to another, or damage to property"* and
 - c) *"is so unpredictable that he requires another person to be present and watching over him whenever he is awake"*.
47. It follows therefore that, if C had been awarded higher rate mobility DLA under criterion 6, his application for a parking bay should have been considered as an exception on the basis that *"the applicant requires constant attendance"*.
48. Alternatively, to be awarded higher rate mobility DLA under criterion 7, on the basis of being *"virtually unable to walk"*, a child must have a physical disability which makes their ability to walk very limited. Behavioural issues with a physical origin can be taken into account. Interruptions in walking or a refusal to walk can be taken into account if this frequently limits how far they can walk.
49. We consider that the award of higher rate mobility DLA was directly relevant to Mrs B's appeal and should have been explored further in that the Tribunal had determined either that C was *"virtually unable to walk"* or that he *"requires constant attendance"*. We also consider that the Council's dismissal of that award

as being of a lower threshold than the Council's own mobility criteria suggests a lack of consideration of the implications of such an award.

Conclusion

50. We have found fault in the way that the Council considered Mrs B's application for a parking bay for C, and this has caused C and his family injustice. We have therefore considered what is an appropriate remedy for that injustice.
51. We considered whether to ask the Council to carry out a fresh mobility assessment. However, given the implications of the award of higher rate mobility DLA, the observations of the second assessor as to the severity of C's situation and the impact on the family, the Council's own discretionary award of a Blue Badge, and the information contained in the Child and Carer's Assessment, we consider that any reasonable consideration of whether the policy exception applied or whether to exercise discretion would have resulted in a decision to install a parking bay.


Recommended action

52. To remedy the injustice to C and his family, we recommend that the Council within three months:
- install a parking bay for C;
 - pay the family £1,000 to reflect the significant distress and inconvenience caused as a result of the delay installing a parking bay;
 - review its parking bay policy within three months having regard to how it should take into account hidden disabilities;
 - once it has reviewed its policy, write to those applicants who have been refused a parking bay over the past year and inform them of the changes to its policy;
 - ensure that officers are aware of the implications of an award of higher rate mobility DLA and that decisions relating to parking bay applications take into account both the exceptions in its policy and the Council's general discretion; and
 - ensure that decision letters on both Blue Badge and parking bay applications contain sufficient information to enable the applicant to clearly understand the reasons for that decision.

Draft decision

53. On the evidence seen to date, we propose to complete our investigation into this complaint by issuing a report. We have found evidence of fault causing injustice. We have recommended action to remedy the injustice caused.

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<p>Cabinet</p> <p>16 December 2020</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Kevin Bartle, Acting Corporate Director of Resources</p>	<p>Classification: Unrestricted</p>
<p>2021-22 Budget Consultation Outcome</p>	

Lead Member	Councillor Candida Ronald, Cabinet Member for Resources and the Voluntary Sector
Originating Officer(s)	Allister Bannin, Head of Strategic and Corporate Finance
Wards affected	All wards
Key Decision?	No
Forward Plan Notice Published	3 December 2020
Reason for Key Decision	N/A
Strategic Plan Priority / Outcome	<p>1. People are aspirational, independent and have equal access to opportunities;</p> <p>2. A borough that our residents are proud of and love to live in;</p> <p>3. A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.</p>

Executive Summary

In February 2021 the Council will agree its budget for 2021-22. In line with previous years, the Council has carried out consultation with residents, businesses and other key stakeholders to help inform budget decisions. This report for noting provides the results of the Council’s 2021-22 budget consultation carried out from October to December 2020.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the outcome of the Council’s 2021-22 budget consultation with business ratepayers, residents and other key stakeholders.

1. REASONS FOR THE DECISIONS

- 1.1 The Council has a statutory duty to carry out budget consultation with businesses and it is considered good practice to also consult with residents and key stakeholders.
- 1.2 Due to the impact of the Covid-19 pandemic, Tower Hamlets now finds itself in a materially changed environment from that which existed in February 2020 when the budget and medium term financial strategy were approved by the Council.
- 1.3 The Council is under a duty to set a balanced and sustainable budget and maintain adequate reserves such that it can deliver its statutory responsibilities and priorities.
- 1.4 The setting of the budget is a decision reserved for Full Council. The Council's Budget and Policy Framework requires that a draft budget is issued for consultation with the Overview & Scrutiny Committee to allow for their comments to be considered before the final budget proposals are made to Full Council.
- 1.5 As the Council develops its detailed proposals it must continue to keep under review those key financial assumptions which underpin the Council's MTFS; in particular as the Council becomes ever more dependent on locally raised sources of income through the Council Tax and retained business rates these elements become fundamental elements of its approach and strategies.

2. ALTERNATIVE OPTIONS

- 2.1 Whilst the Council will adopt a number of approaches to the identification of measures aimed at delivering its MTFS it must set a legal and balanced budget and maintain adequate reserves.
- 2.2 The Council is required to set an affordable Council Tax and a balanced budget, while meeting its duties to provide local services. This limits the options available to Members. Nevertheless, the Council can determine its priorities in terms of the services it seeks to preserve and protect where possible, and to the extent permitted by its resources, those services it wishes to prioritise through investment.

3. DETAILS OF THE REPORT

3.1 BACKGROUND

- 3.1.1 The medium term financial planning process is an essential part of the Council's resource allocation and strategic service planning framework. The Medium Term Financial Strategy (MTFS) integrates strategic and financial planning over a three year period. It translates the Strategic Plan priorities into

a financial framework that enables the Mayor and officers to ensure policy initiatives can be delivered within available resources and can be aligned to priority outcomes.

3.1.2 The drivers for the Council's financial strategy are:

- To set a balanced budget over the life of the MTFS whilst protecting residents from excessive Council Tax increases, as defined by the government, through the legislative framework covering Council Tax referenda.
- To fund priorities agreed within the Strategic Plan, ensuring that service and financial planning delivers these priorities.
- To deliver a programme of planned reviews and savings initiatives designed to keep reductions to service outcomes for residents to a minimum.
- To maintain and strengthen the Council's financial position so that it has sufficient contingency sums, reserves and balances to address any future risks and unforeseen events without jeopardising key services and delivery of service outcomes for residents.
- Ensuring the Council maximises the impact of its spend to deliver priority outcomes in the context of reducing resources.

3.1.3 In February 2020 the Council agreed a balanced budget for 2020-21 and a Medium Term Financial Strategy (MTFS) to 2022-23 identifying further savings of £8.653m to be delivered over that period and utilising £1.740m of general fund reserves in 2020-21.

3.1.4 Since 2011-12 in the face of unprecedented reductions in Government funding and increasing demand on services, the need to make savings has dominated the Council's financial planning process. In early 2020 a further dimension appeared with the need for local authorities to respond immediately to the Covid-19 virus.

3.2 STRATEGIC APPROACH

3.2.1 The Strategic Plan 2020-23 was refreshed at the Cabinet meeting on 29 July 2020 to take account of the Covid-19 pandemic impacts of exposed inequality and rising demand, as well as opportunities to holding on to gains such as improved air quality, delivering services in a different way and tackling rough sleeping. The refreshed Strategic Plan focuses on the three priorities set out below; within each priority there are a number of outcomes which guide how services will be delivered in the interests of residents.

Table 1 – Strategic Priority Outcomes

Priority 1: People are aspirational, independent and have equal access to opportunities	
Outcomes we want to achieve	People access a range of education, training, and employment opportunities.
	Children and young people are protected so they get the best start in life and can realise their potential.
	People access joined-up services when they need them and feel healthier and more independent.
	Inequality is reduced and people feel that they fairly share the benefits from growth.
Priority 2: A borough that our residents are proud of and love to live in	
Outcomes we want to achieve	People live in a borough that is clean and green.
	People live in good quality affordable homes and well-designed neighbourhoods.
	People feel safer in their neighbourhoods and anti-social behaviour is tackled.
	People feel they are part of a cohesive and vibrant community.
Priority 3: A dynamic, outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough	
Outcomes we want to achieve	People say we are open and transparent putting residents at the heart of everything we do.
	People say we work together across boundaries in a strong and effective partnership to achieve the best outcomes for our residents.
	People say we continuously seek innovation and strive for excellence to embed a culture of sustainable improvement.

3.3 TIMETABLE

- 3.3.1 In the 6th January Cabinet report, Members will be presented with an updated MTFs, including taking account of government funding announcements received before then and updated income assumptions for Council Tax and Business Rates.

3.3.2 The draft timetable for the budget setting process is as follows:

Activity	Date
Review of the MTFs considering budget consultation outcome	6 January 2021 Cabinet
Approval of Fees & Charges 2021-22	
Approval of Council Tax Base 2021-22	
Agree proposal of average housing rent increase and average tenanted service charge increase	
Agree the Local Council Tax Reduction Scheme proposal (if changes are proposed)	LCTRS changes would require Council approval by end of January 2021
Overview & Scrutiny Committee - Budget Scrutiny meeting to review final Cabinet budget proposals and provide comments for consideration by Cabinet and Full Council	11 January 2021 (and February date TBC)
Review of the MTFs following Local Government Financial Settlement	27 th January 2021 Cabinet
Approval of Capital Programme 2021-24	
Agree final budget and setting of Council Tax	By 1 st March 2021 Full Council

3.4 BUDGET CONSULTATION AND SCRUTINY PROCESS 2021-24

- 3.4.1 The Council must undertake statutory budget consultation with Business Rates payers in the borough and it is also good practice to consult with Council Tax payers and a broad range of other key stakeholders. In addition, meaningful consultation must take place with service users before any changes to service provision are implemented. Furthermore, the Council's budget framework sets out the need for the Overview and Scrutiny Committee to be involved in the setting of the Council's budget.
- 3.4.2 The Council carried out the six weeks budget consultation campaign from Wednesday 28 October until Wednesday 9 December 2020. The consultation sought to provide details of the financial challenges the Council currently faces and requested feedback on priorities for Council services. It also asked how the Council should consider its approach in light of the budgetary pressures it faces which have increased due to the impact of the Covid-19 pandemic.

3.4.3 A campaign narrative was agreed which identified and articulated the key drivers for the Council's approach. The key messages in this narrative were:

- Ongoing financial pressures, including responding to Covid-19, mean that despite saving £200m since 2020, the Council now has to save a further £30m by 2024.
- The impact of Covid-19 has highlighted the importance of public services. However, while the Government said that local councils should do 'whatever it takes' to support their communities they have not fully covered the reduced income and increased costs the Council has faced and this is on top of over a decade of austerity.
- Despite challenges from budget cuts, increases in demand from vulnerable residents and a rising population, the Council has continued to invest in frontline services and has the seventh lowest council tax in London.
- The Council is committed to adapting its services with a continuing focus to make them more efficient. It also has a number of anti-poverty measures in place including funding for free school meals and one of the most generous council tax reduction schemes in the country.
- Residents and businesses were encouraged to get involved by giving their views on what matters most to them, and suggesting ways in which Tower Hamlets can do things differently to help make savings.

3.4.4 The campaign aimed to engage as many residents and businesses as possible during a six weeks consultation period. A wide range of visible communication methods were employed, including an Our East End story ahead of consultation, press releases, local media promotion including with BAME media, Council website promotion linking to the online Let's Talk Tower Hamlets Consultation Hub. A major social media campaign carried regular messages and used the budget consultation designs and infographics focused on the key narrative.

There were regular stories urging people to take part in the consultation promoted across a number of e-newsletters including the Council's weekly e-newsletter and the Bengali language e-newsletter. Additional direct promotion took place with staff, elected Members and with key partners.

An 8-page budget consultation booklet was designed and delivered to every home across the borough to maximise awareness of the key issues and encourage engagement with the consultation.

Mayor John Biggs also led a virtual 'Ask The Mayor' event on the evening of Tuesday 24 November, where viewers could ask their questions related to the budget.

The campaign also ensured representative views were sought (i.e. there was opportunity for people from all parts of the borough and from different age groups and ethnicities to take part). As in previous years, the Council has employed a dual approach of self-selection (opting-in to the Council's online

Let's Talk Tower Hamlets consultation hub), and commissioned telephone surveys carried out by SMSR Research to support a representative set of responses.

Face-to-face interviews or public engagement sessions such as those that have previously taken place at Idea Stores and other public locations could not take place this year due to the Covid-19 pandemic restrictions.

3.4.5 The consultation on Your Borough Your Future started on Wednesday 28 October and closed on Wednesday 9 December 2020. A total of 1,955 responses were received. A representative sample of 1,138 residents and 468 businesses were interviewed by SMSR Research. In addition, a total of 349 residents, businesses and community groups responded to the consultation hosted on the Council's Let's Talk Tower Hamlets consultation hub. Whilst most people identified with the demographic and geographic breakdown, not all demographic responses were fully completed and no assumptions have been made where these have been left blank.

Overall, three-quarters responded as a local resident (75%), just under a quarter responded as a business (23%) and 1% via a local community organisation. All responses have been combined in the report.

3.4.6 Key findings of the budget consultation include:

- Overall, Public Health is the most valued service (41%), followed by Community Safety (38%), Children's Services and Education (34%) and Services for Elderly and Vulnerable Adults (33%).
- Public Health (again at 41%) is seen as the most important service in a list of the top three to prioritise. Followed by Children's Services and Education (36%), Community Safety (35%) and Services for Elderly and Vulnerable Adults (34%).
- Half (50%) felt the Council should reduce spending on temporary agency staff. Followed by (45%) support for more services using digital technology and (40%) support to generate more commercial income and maximise the use of council assets.
- The majority felt the availability (78%) and quality (58%) of services will decline as a result of further savings. 52% believed services would become more efficient as a result of savings.
- To minimise the impact of savings there was most support for better use of council assets to generate income (54%) followed by working more closely with the voluntary sector and partners (45%), and sharing services with neighbouring boroughs and more use of technology (44%).
- Just under half (47%) support a council tax rise, with 43% opposed and 10% don't know.
- Of those who support a council tax rise, 26% would support an increase of up to 2%, followed by 12% support for a rise between 2% and 3%.
- More than half (56%) were in favour of an adult social care precept, with over a quarter (28%) against, and 16% don't know.

- Increased income generation from greater use of council assets and through fees and charges were supported by almost three quarters (74%), with 14% opposed and 11% don't know.

3.4.7 A detailed report of the budget consultation results provided by SMSR has been included in Appendix 1 of this report.

4 EQUALITIES IMPLICATIONS

4.1 The Equality Act 2010 requires the Council, in the exercise of its functions to have due regard to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

4.2 Strategic budget implications in respect of the Council's available funding and budget risks will tend to apply equally across all groups with protected characteristics or otherwise.

4.3 The HRA and DSG are ring-fenced funding allocations with prescriptions governing their use. In addition, several grants received by the Council can only be used in accordance with specified conditions.

4.4 The Council must maintain a Local Council Tax Reduction Scheme which will prescribe those individuals that can gain relief from the full cost of their Council Tax bill. Government legislation also preserves some historic protections for other groups such as those not of working age.

4.5 Individual budget proposals will also be subject to consultation which will consider specifically the impact on groups with protected characteristics and where appropriate put in place mitigation measures.

4.6 Tower Hamlets is a dynamic place where a thriving economy co-exists with high levels of poverty. The Council is working to make the borough a safer, cleaner and fairer place to live and improve outcomes for local people however inequalities still exist. The borough is the second most densely populated local authority in the country with almost 19,000 people on the housing waiting list – the third highest in London – and between 2016-17 and 2030-31 Tower Hamlets is expected to accommodate an additional 54,000 homes. There are significant health problems and the borough has the lowest life expectancy rates in London (disability-free) and 43% of Year 6 children are overweight or obese. Tower Hamlets has the highest rates of child poverty in England at 32.5% and half of all residents aged 60+ live below the poverty line (highest proportion in England and more than double the average). Coupled with this is the fact that Tower Hamlets has one of the fastest growing populations in the UK which is projected to rise from 317,000 in 2019 to 380,598 by 2030.

4.7 These inequalities and rapid growth mean that ensuring equality is embedded throughout Council plans, services and activities is the number one priority and at the heart of all decision making. To help meet its duty under the Equality Act

the Council undertakes equality impact assessments to analyse a proposed change in order to assess whether it has a disproportionate impact on persons who share a protected characteristic. As part of our budget setting process an equality impact assessment checklist is carried out on all new savings proposals to determine if a full equality impact assessment needs to be carried out.

- 4.8 As part of its budget setting process the council also consults with residents, businesses and community organisations to get their views in order to help shape the council's budget and council tax rate for 2021-22.
- 4.9 Increasing pressures on the Council's limited finances due to the impact of the Covid-19 pandemic mean that the Council needs to save an extra £30 million by 2024. This is a major challenge for the Council which needs to give careful consideration to every penny spent while ensuring that equality remains at the heart of all decision making.

5. OTHER STATUTORY IMPLICATIONS

- 5.1 The Council is required to consider the value for money implications of its decisions and to secure best value in the provision of all its services. It is important that, in considering the budget, Members satisfy themselves that resources are allocated in accordance with priorities and that best value is achieved.
- 5.2 The preparation of the MTFs takes account of the Council's obligations in relation to its Best Value duty. The budget proposals are based on securing best value within the context of continuing reductions in Council funding and service demand pressures.
- 5.3 The sustainable action for a greener environment implications of individual proposals in the budget are set out in the papers relating to those proposals.
- 5.4 Managing financial risk is of critical importance to the Council and maintaining financial health is essential for sustaining and improving service performance. Setting a balanced and realistic budget is a key element in this process. Specific budget risks will be reported to Cabinet as the budget process develops. The Council will maintain a range of budget provision (contingency) earmarked reserves for specific risks and general reserves for unforeseen events and risks.
- 5.5 The crime and disorder implications of individual proposals in the budget are set out in the papers relating to those proposals.
- 5.6 Any safeguarding implications of individual proposals in the budget are set out in the papers relating to those proposals.

6. COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 The government's Core Spending Power calculation makes assumptions about the level of growth in the Council Tax base and that authorities will increase Council Tax each year up to the referendum limit.
- 6.2 Not increasing the Council Tax in line with government assumptions could result in a growing financial pressure over the MTFs due to the impact on the Council's on-going tax raising base and also through the Fair Funding review where the government has indicated its preference to use a notional level of Council Tax rather than actual Council Tax levels to determine the extent of resources available to each authority.
- 6.3 Following receipt of the final settlement, the Chief Finance Officer (CFO) will need to be assured of the robustness of estimates and adequacy of reserves and this will be covered in the report to Cabinet on 27 January 2021.

7. COMMENTS OF LEGAL SERVICES

- 7.1 The Council is required by section 151 of the Local Government Act 1972 to make arrangements for the proper administration of its financial affairs. The budget planning represented in this report is consistent with this legal duty.
- 7.2 Under the law any consultation must occur whilst the relevant decision is still at a formative stage. The consultation discussed in this report is valid in that respect.
- 7.3 The adoption of the final budget is reserved as a non-executive decision of full Council in accordance with the Constitution. Therefore, the results of the consultation will be taken into consideration but only in as far as the executive forms a recommendation which may only be adopted by a decision of full council.
- 7.4 Any resultant recommendations to full council which emanate from this consultation may involve and adjustment to the way the Council seeks to fulfil its statutory functions. This may mean that:

7.4.1 the actual changes may be subject to further specific consultation with stakeholders and

7.4.2 where the changes may have an effect on persons with a protected characteristic that the changes will be subject to specific Equalities assessments and consultation where the Council requires such consultation to gain a proper understanding under the law of the effect of those changes on such persons.

Linked Reports, Appendices and Background Documents

Appendices

- Appendix 1 Budget Consultation 2020

Linked Report

- None

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None

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Budget Consultation 2020

On behalf of London Borough of Tower Hamlets

December 2020



Prepared by



Contents

1.0 HEADLINE FINDINGS	3
1.1 Headline findings	3
2.0 INTRODUCTION	5
2.1 Background	5
2.2 Report structure.....	5
3.0 SAMPLE / METHODOLOGY.....	6
Residents	7
Businesses	9
4.0 FINDINGS.....	10
5.0 APPENDICES	20
5.1 Questionnaire	20

1.0 Headline Findings

1.1 Headline findings

Overall, residents, businesses, and community groups across Tower Hamlets value Public Health Services the most (41%), followed closely by Community Safety (38%). This is understandable, given the event of the recent Covid-19 pandemic and subsequent issues triggered by the outbreak. More than a third value Children's Services and Education (34%) and Services for the Elderly and Vulnerable Adults (33%) the most. Culture, libraries, and Parks (22%) and Highways and Transport Services (14%) were deemed to be the least valuable services in the borough at this time.

Businesses in the borough placed similar levels of importance on Public Health (38%) but, perhaps instinctively, placed more value on Economic Growth and Job Creation (39%), however, considered Community Safety to be most valuable (41%).

When considering business priorities, Economic Growth and Job Creation (38%) and Community Safety were ranked slightly higher than Public Health (36%), reinforcing initial trends found amongst this cohort.

When contemplating the areas in which additional savings could be made, half (50%) said they would prefer the Council to reduce spending on temporary agency staff. Almost half (45%) felt there are opportunities to reduce costs by delivering more services using digital technology and two-fifths (40%) thought the Council could generate more commercial income and maximise use of its assets (although it was highlighted in the options this may be problematic in the current circumstances). Just a tenth (10%) felt that savings could be made by reducing spending on frontline services.

A slim majority (52%) believed that the impact of further savings would make the Council more efficient, although more than three-quarters (78%) predicted that fewer services would be available and nearly three-fifths (58%) expected service quality to be reduced as a result.

More than half (54%) felt that, in order to mitigate the impact of savings the Council is required to make by the Government, it should investigate better use of assets and other ways to generate income – an action highlighted as preferable earlier in the survey. More than two-fifths (45%) said it is important to work closely with organisations in the voluntary and community sector and partner organisations such as the NHS to deliver more joined up services and share services with neighbouring boroughs to make council services more efficient through greater use of digital technology (44%). Less than a fifth (18%) deemed it important to outsource services to the private sector.

Respondents were more inclined to support a proposal to increase council tax with 47% approving of the action and 43% in opposition – a tenth (10%) said they did not know. Furthermore – of those who did support an increase in council tax, a quarter (26%) revealed they would support a rise of up to 2%, more than a tenth (12%) said they would support an increase between 2% and 3%. Less than a tenth (4%) stated they would support an increase in council tax between 3% and 4% or above 4% (5% of respondents).

Overall, the majority (56%) said, if permitted, they would support an adult social care precept in order to support adult social care. A quarter (28%) opposed this proposal with 16% of respondents stating they did not know.

Almost three quarters (74%) agreed that the council should expand its approach to income generation such as using its unique assets for events and filming, as well as through fees and charges. Less than a fifth (14%) did not support this policy and a tenth did know (11%).

2.0 Introduction

2.1 Background

Tower Hamlets Council has worked hard to make £200m in savings since 2010, its budget has been cut by the Government and squeezed by additional demand. The additional pressures that have now been experienced because of the pandemic means the Council will now have to save a further £30m by 2024.

The required savings are subject to significant uncertainty as this will depend on both the extent to which the Government provides additional funding for Covid-19 pressures, and the impact of the pandemic on income from council tax and business rates.

The Council has made a number of tough choices to minimise the impact on those services residents have said that they rely on the most. The Council has reduced its own running costs, been more efficient in how services are delivered, and reduced its workforce by a third since 2010.

The Council has to make the most of the money it has, as well as continuing to look at innovative ways to generate income and have asked residents, businesses, and community groups to get involved in the conversation and provide their opinions.

In addition to an online consultation, hosted on the council's Let's Talk Tower Hamlets consultation hub, SMSR Ltd, an independent research company was commissioned to undertake a telephone survey with residents and businesses from across the borough to help the council understand priorities and the impact savings may have on people living and working in Tower Hamlets.

2.2 Report structure

This report includes headline findings for each question combined with insight based on demographic trends. It should be noted that when the results are discussed within the report, often percentages will be rounded up or down to the nearest one per cent. Therefore, occasionally figures may add up to 101% or 99%. Due to multiple responses being allowed for the question, some results may exceed the sum of 100%.

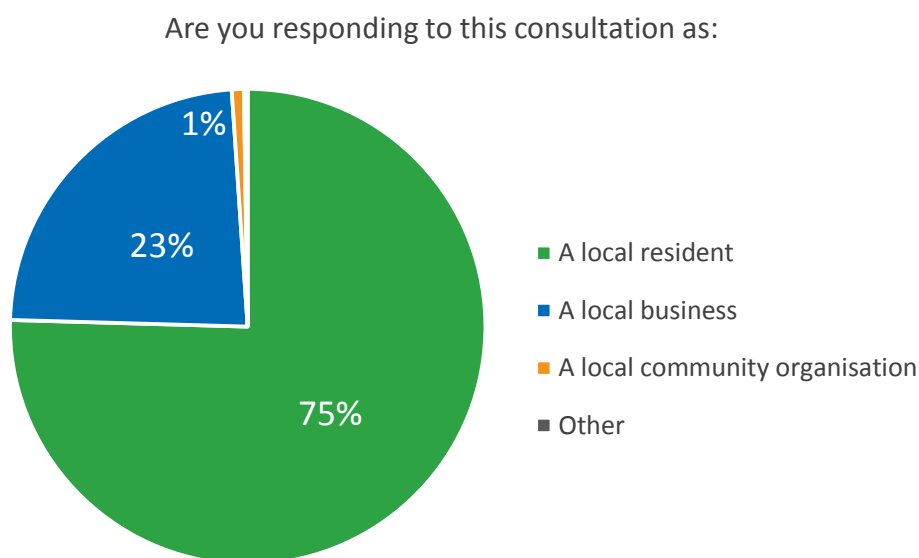
Trends identified in the reporting are statistically significant at a 95% confidence level. This means that there is only 5% probability that the difference has occurred by chance (a commonly accepted level of probability), rather than being a 'real' difference. Unless otherwise stated, statistically significant trends have been reported on.

3.0 Sample / Methodology

An interviewer led, CATI telephone questionnaire was designed by SMSR in conjunction with staff from Tower Hamlets Council. The survey script mirrored the online consultation on the Let's Talk Tower Hamlets consultation hub.

Interviews were conducted using random quota sampling to maximise representation across the borough. Sample data was drawn from several, GDPR compliant sources to extend the scope of potential participants as much as possible. Target quotas for age, gender and ethnicity were set using the most recent ONS figures available for the residents' consultation and the sample included representation from each of the ward within the borough. Quotas for business interviews were set by business size.

Respondents were asked to identify as a local resident, a local business, or a community group:



A total of 1,955 residents, businesses and community groups took part in the consultation, overall. A representative sample of 1,138 residents were interviewed by SMSR Ltd using Computer Aided Telephone Interviewing (CATI) methodology. A further sample of 468 businesses were interviewed by SMSR Ltd, using the same methodology. In addition, a total of 349 residents, businesses and community groups responded to an online consultation, hosted on the council's website. Overall, three-quarters responded as a local resident (75%), just under a quarter responded as a business (23%) and 1% via a local community organisation. All responses have been combined in this report.

The demographic and geographic breakdown of residents and businesses was as follows:

Residents

The following tables show the demographic breakdown of all respondents who participated in the research and identified themselves as a local resident (1,475). Please note that not all residents provided demographic information.

Gender	Number	Percentage of sample
Male	721	49%
Female	716	49%
Prefer to self-identify	1	0%
Prefer not to say	37	3%

Age	Number	Percentage of sample
0-15	1	0%
16-24	126	9%
25-34	354	24%
35-44	376	25%
45-54	227	15%
55-64	173	12%
65-74	124	8%
75+	68	5%
Prefer not to say	40	2%

Ethnicity	Number	Percentage of sample
White	781	53%
BAME	641	43%
Prefer not to say	53	4%

Ward	Number	Percentage of sample
Bethnal Green	105	9%
Blackwall & Cubitt Town	66	6%
Bow East	88	8%
Bow West	82	7%
Bromley North	74	7%
Bromley South	39	3%
Canary Wharf	16	1%
Island Gardens	27	2%
Lansbury	47	4%
Limehouse	29	3%
Mile End	95	8%
Poplar	56	5%
Shadwell	63	6%
Spitalfields & Banglatown	77	7%
St Dunstan's	40	4%
St Katharine's & Wapping	36	3%
St Peter's	31	3%
Stepney Green	49	4%
Weavers	50	4%
Whitechapel	67	6%

*Please note that no geographical information was collected during the online consultation.

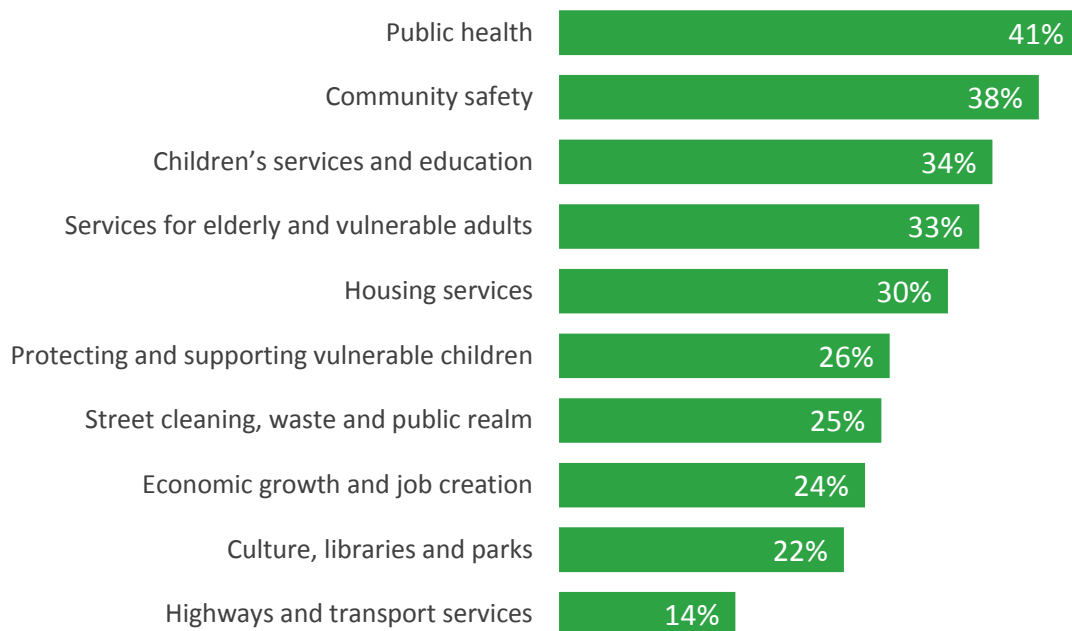
Businesses

Business size	Number	Percentage of sample
Micro (1-10 employees)	248	54%
Small (11-49 employees)	184	40%
Medium (50-249 employees)	21	5%
Large (250+ employees)	3	1%

Ward	Number	Percentage of sample
Bethnal Green	36	8%
Blackwall & Cubitt Town	9	2%
Bow East	11	2%
Bow West	14	3%
Bromley North	54	12%
Bromley South	15	3%
Canary Wharf	24	5%
Island Gardens	4	1%
Lansbury	6	1%
Limehouse	6	1%
Mile End	46	10%
Poplar	16	3%
Shadwell	35	7%
Spitalfields & Banglatown	32	7%
St Dunstan's	6	1%
St Katharine's & Wapping	3	1%
St Peter's	9	2%
Stepney Green	10	2%
Weavers	46	10%
Whitechapel	85	18%
Not known	1	0%

4.0 Findings

In your opinion, which council service(s) do you value the most?



Respondents were asked to choose which council services they valued the most from a list. Perhaps, unsurprisingly, given the current Covid-19 Pandemic, Public Health services were valued the most by more than two-fifths (41%) of residents. This service was closely followed by Community Safety (38%) with a third of residents stating they value Children's Services and Education (34%) and Services for Elderly and Vulnerable Adults (33%) the most. Respondents valued these more pertinent services amidst the current circumstances over Culture, Libraries and Parks and Highways and Transport services, both which less than a quarter found valuable (22% and 14% respectively).

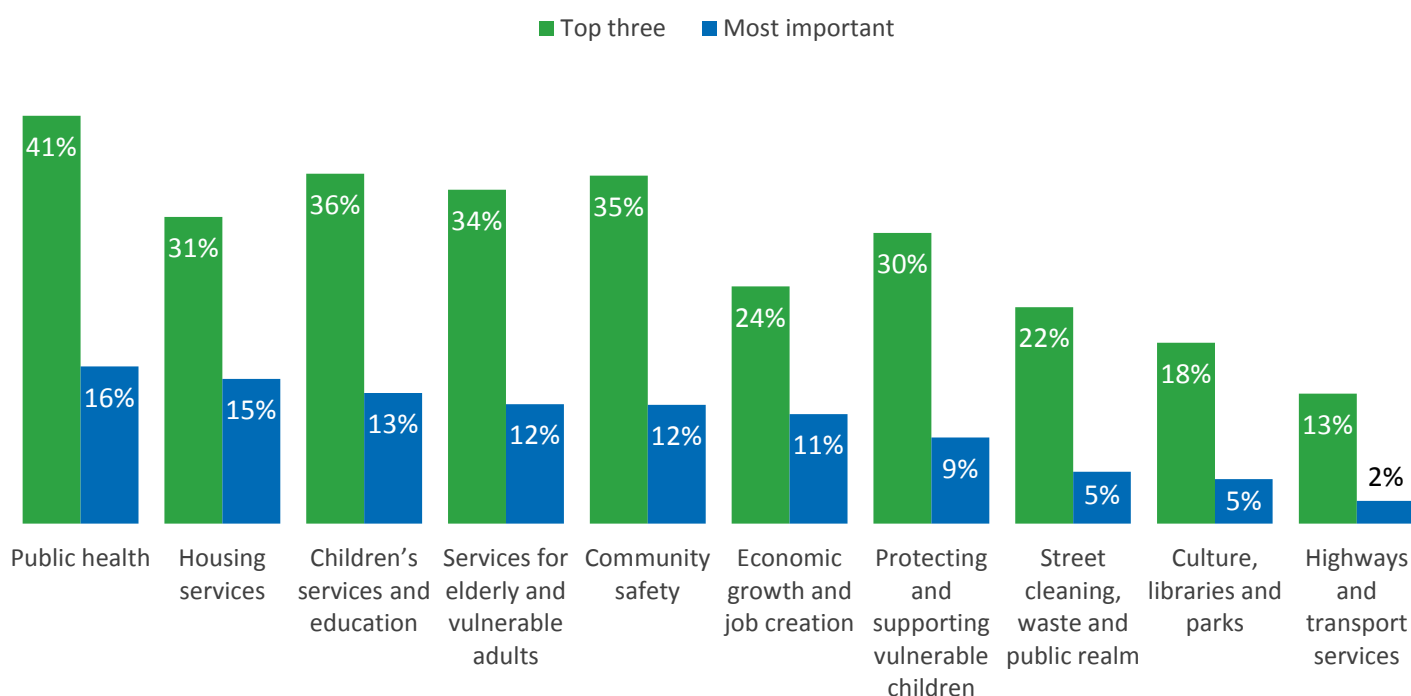
Public Health and Community Safety were found to be universally, very valuable across demographic subgroups, however, females tended to place more value upon children's services compared to males (37% vs 31%) together with services for the elderly (37% female vs 29% male). The value of Services for the Elderly generally increased with age with more than half (58%) of respondents aged 65+ stating this service was most valuable whereas children's services tended to be more valuable to younger residents, particularly those aged 25 to 44.

BAME respondents also felt Children's Services were more valuable compared to White participants (37% vs 32%) with this cohort also placing more value on Housing Services (36% BAME vs 26% White) and Economic Growth (28% BAME vs 20% White).

Nearly three-fifths of respondents in Stepney Green (58%) and St Peter’s (58%) considered Public Health to be most valuable compared to a third in Bow West (34%) and Island Gardens (35%).

When considering the most valuable services to those who responded as a local resident, Public Health was considered to be the most valuable service, with nearly half of this opinion (47%). This was followed by Children’s Services (42%) and Services for the Elderly (38%). Those responding as a business placed most value on community safety (41%) and Economic Growth (39%) – slightly higher than Public Health (38%).

With limited resources available, please tell us which services you think the council should prioritise?



Participants were asked to contemplate, with limited resources available, which council services should be prioritised. Respondents were asked to rank the options including the service they believed was most important to prioritise. The chart above shows respondents’ top three priorities together with the service ranked most important.

As with the previous question, Public Health (41%) was considered to be most important to prioritise alongside Children’s Services (36%), Community Safety (35%), Services for the Elderly (35%). Although Housing Services was deemed a ‘mid-table’ priority amongst respondents top three choices, this service was seen to be the second most important priority, behind Public Health when reviewing respondents’ most important choice.

Furthermore, similar patterns were found between value and priorities when exploring age and gender subgroups. Public Health services were prioritised universally amongst demographic groups whereas females tended to be more inclined to prioritise Children's Services compared to males (37% vs 31%) and Services for the Elderly (39% vs 33%). Males tended to prioritise Economic Growth more prominently than females (29% vs 19%).

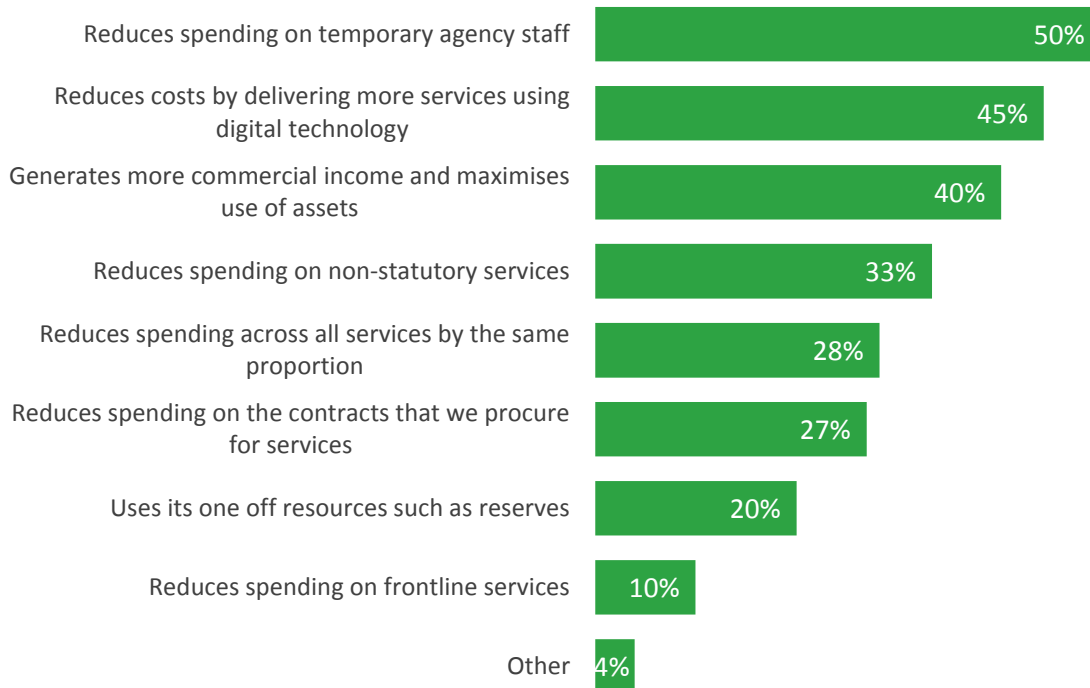
Similar trends were also found throughout age categories with older people more likely to prioritise Services for the Elderly with quarter of those under 25 (24%) considering this service a priority compared to three-fifths of those over 65 (58%). Prioritisation of Children's Services revealed a reverse in this trend with younger respondents more likely to emphasise this service as a priority (41% under 24 vs 33% 65+).

BAME respondents were more likely to prioritise Housing Services compared to White respondents (38% vs 26%) and also saw Economic Growth as a more critical priority (27% BAME vs 22% White).

Around three-fifths of respondents in Island Gardens (61%), Stepney Green (58%) and Limehouse (57%) felt that Public Health was a priority compared to just a third in Bow West (34%). More than half in Bromley North and Bromley South (both 54%) felt that Housing Services should be prioritised compared to less than a fifth of those in Island Gardens (19%), Lansbury (17%) and Limehouse (14%). Residents of Bow west were most likely to prioritise Children's Services (50%) with St Dunstan's and Poplar more focussed on Services for the Elderly (48% and 46% respectively).

Nearly half of residents (47%) felt that Public Health should be prioritised compared to 36% of businesses. Residents also believed Children's Services (41%) and Services for the Elderly (38%) were also important priorities. Although Public Health was still a top three priority amongst businesses, Economic Growth (38%) and Community Safety (38%) were slightly higher concerns.

We have made savings in the following areas, but as we have to make additional savings, would you prefer that the council:

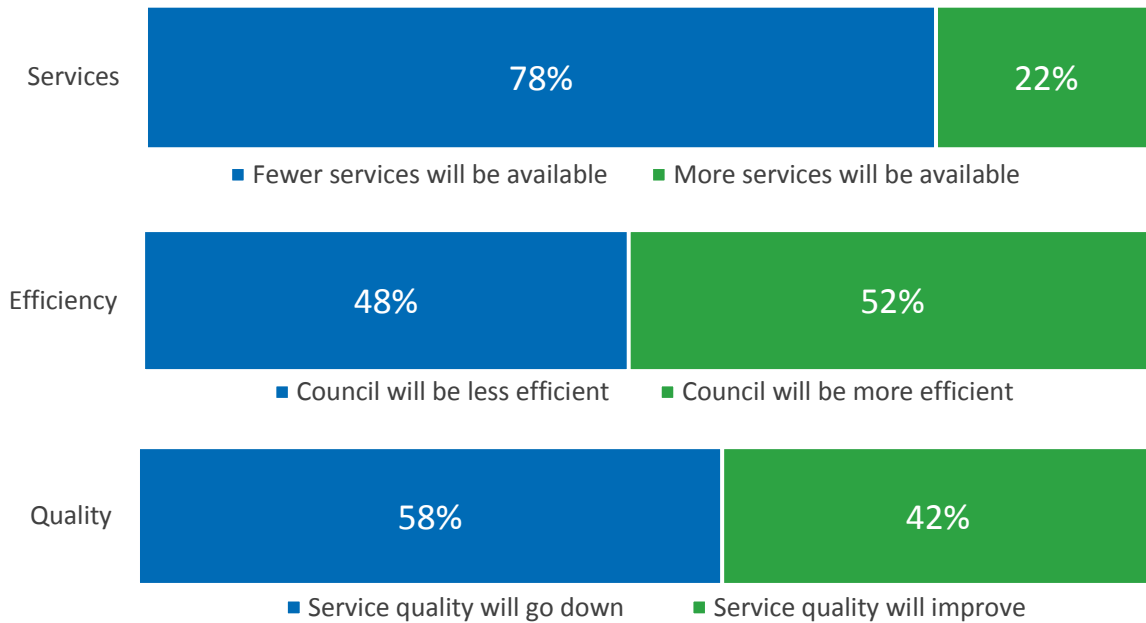


As core government funding continues to fall and the Council have to make further savings, respondents were asked where they would prefer Tower Hamlets Council to make additional savings. Exactly half of respondents felt that additional savings could be made by reducing spending on agency staff. More than two-fifths (45%) thought that savings could be made by delivering services using digital technology – an action no doubt accelerated by the current pandemic – and two-fifths (40%) would prefer the Council to generate income and maximise the use of its assets (albeit a difficult task under current conditions). Only a tenth (10%) said they would prefer the Council to reduce spending on frontline services.

Perhaps naturally, respondents aged under 45 were more likely to view the use of digital technology as a driver of additional savings with more than half of those aged under 24 (52%) and 25-34 (54%) advocating this action compared to less than a third of those aged 65+ (31%).

Both residents and businesses in Tower Hamlets agreed that savings should be made by reducing spending on temporary agency staff (54% and 47% respectively). More than two-fifths of residents stated they would prefer to reduce costs by generating more commercial income (43%) or delivering services digitally (41%). Businesses were more inclined to favour a reduction in procurement (32%) compared to residents (22%). Both cohorts were least likely to prefer to reduce spending on frontline services.

What do you think the impact of further savings on the borough will mean?

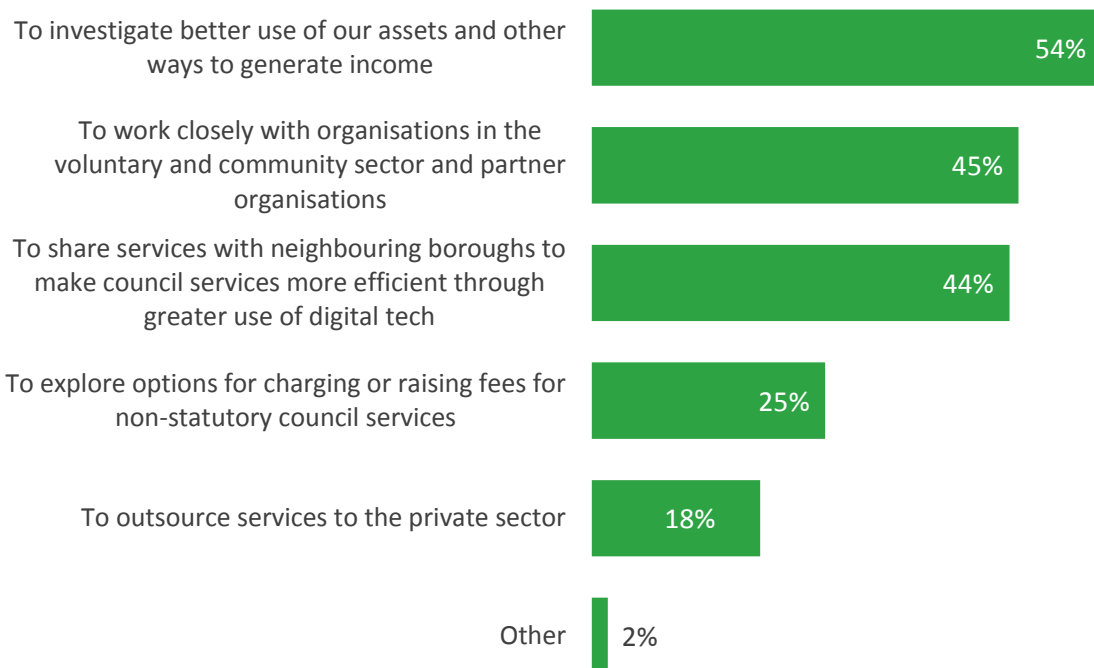


Respondents were asked to contemplate the impact of further savings on the borough, specifically in relation to service availability, council efficiency and service quality. More than three quarters believed that fewer services will be available in the borough as a result of further savings whereas a more even divide was observed for council efficiency - just over half stating they thought the council would become more efficient as a result of savings. Nearly three-fifths (58%) felt the quality of services would be reduced as a result of savings made. So, although a very slim majority expected the council to be more efficient as a result of savings made, many felt that services could be adversely impacted at the same time.

Around 9 in every 10 respondents in Island Gardens felt that fewer services would be available compared to just over half in Bow East (56%). More than three-fifths of residents in Limehouse (71%) and Spitalfields and Banglatown (68%) believed savings would make the council more efficient with the same percentage of the opinion the Council would be less efficient in Stepney Green (61%) and Weavers (61%). Respondents in Stepney Green also were most likely to predict the quality of services would be reduced (78%) compared to 28% in Blackwall and Cubitt Town (28%).

Residents (77%) were slightly more inclined to believe that fewer services would be available due to savings, compared to businesses in the borough (71%).

We are exploring a range of solutions to minimise impact of the savings the council is required to make. If we had to pursue just two options below, which are most important to you?



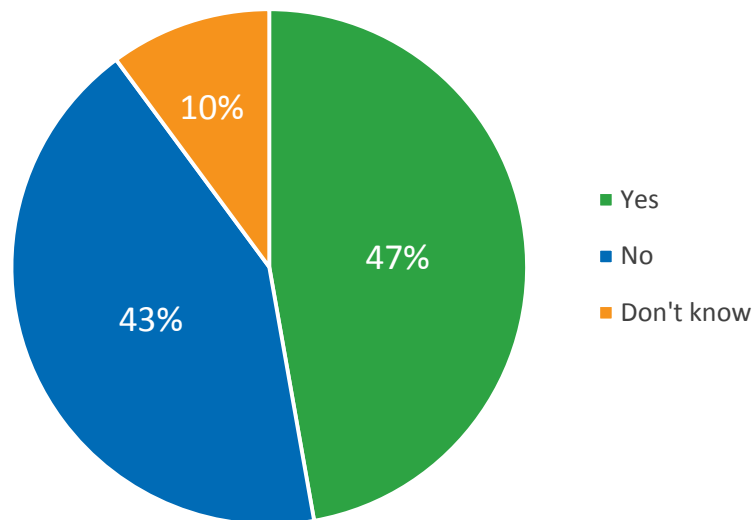
Tower Hamlets Council is exploring a range of options to minimise the impact of the savings the council is required to make. Respondents were asked to choose two options which they thought were most important for the council to pursue.

More than half (54%) identified better use of assets and other ways to generate income as the most important action to minimise the impact of savings. More than two-fifths felt that working more closely with organisations to provide joined up services (45%) and a shared service approach with neighbouring boroughs (44%) were most important in mitigating the impact of savings the council is required to make. Less than a fifth (18%) thought outsourcing services to the private sector was important in combatting the impact in increased savings.

More than two-thirds of residents and businesses in Blackwall and Cubitt Town (71%), Lansbury (70%) and Bow West (70%) felt the council should investigate better use of assets to minimise the impact of savings whereas just a quarter in St Peter's (25%) felt this was the most important action. More than half of those in St Katherine's and Wapping (56%), Island Gardens (52%), Limehouse (51%) and Lansbury (51%) believed that working closely with other organisations would reduce impact, compared to 27% based in Weavers.

Both residents (57%) and businesses (51%) thought that better use of Council assets and other ways to generate income was the most important action in the list of options with over half supporting this solution.

Would you be prepared to support a proposal to increase council tax?



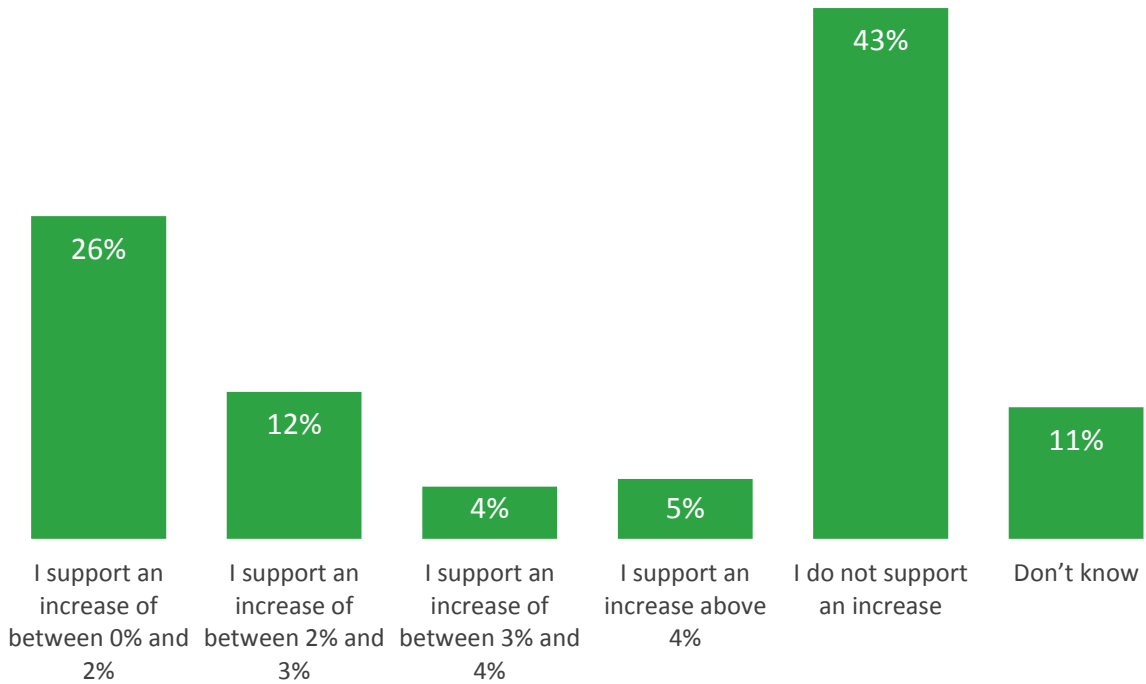
In light of rising costs and demand for services, respondents were asked if they would be prepared to support a proposal to increase council tax, in order to protect services. Respondents were marginally more inclined to support a proposal to increase council tax – 47% yes compared to 43% no. A tenth said they did not know.

Those aged between 25 and 44 were more likely to support the proposal with half of 25-34-year olds (50%) and 35-44-year olds (50%) advocating a rise in council tax compared to two-fifths of those aged under 24 (41%) and over 65 (42%). Furthermore, white respondents (53%) were found to be more inclined to support an increase than BAME respondents (42%).

Residents and businesses in Stepney Green (64%) and Weavers (64%) were most agreeable to an increase in council tax whereas less than a third in Bow West (31%), Bromley North (30%), Lansbury (30%) and Island Gardens (29%) supported this action.

Residents were found to be more supportive towards a proposal to raise council tax compared to businesses (45% vs 39%).

Which of the following council tax increases you would support most:



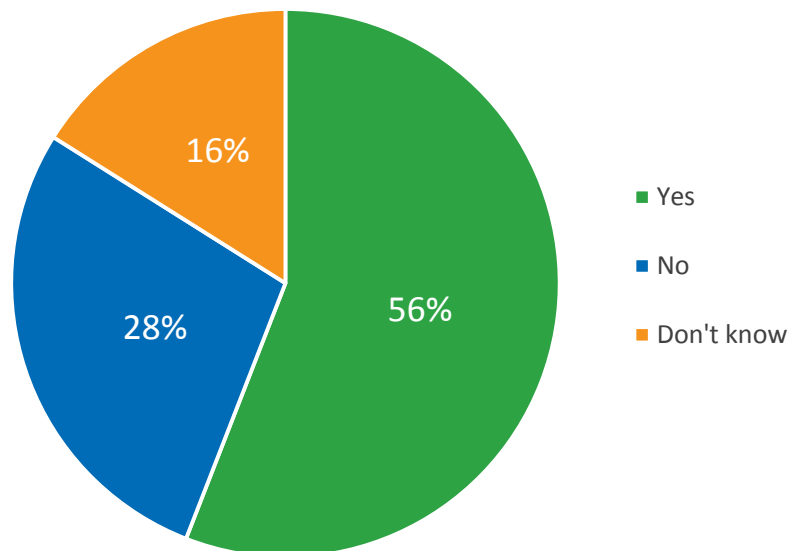
Respondents were then asked to indicate the level of council tax increase they would support most. Consistent with the previous question which asked respondents if they would advocate any increase at all in council tax, 43% repeated they would not. The highest percentage of respondents who would support a rise in council tax, a quarter (26%), said they would favour an increase of between 0% and 2%. Just over a tenth (12%) said they would support an increase of between 2% and 3% with fewer supporting an increase of between 3% and 4% (4%) and an increase above 4% (5%). A tenth said they did not know (11%).

There was little difference when examining trends between age and gender in relation to support for an increase, however, White respondents were more inclined support each increment of increase compared with BAME respondents – 15% White vs 10% BAME for an increase between 2% and 3%, 6% White vs 3% BAME for an increase between 3% and 4% and above 4%).

Respondents in Weavers (51%) were most supportive of the smallest increase (0-2%) with just 13% of those in Bow West (13%) and Island Gardens prepared to agree to this action. Those in Bethnal Green (8%) were most sympathetic to the largest increase of more than 4%

with no respondents in Weavers, Spitalfields and Banglatown, Whitechapel, Bromley South, Canary Wharf, and Island Gardens supportive of this increase.

If permitted, would you support an adult social care precept to support adult social care services?



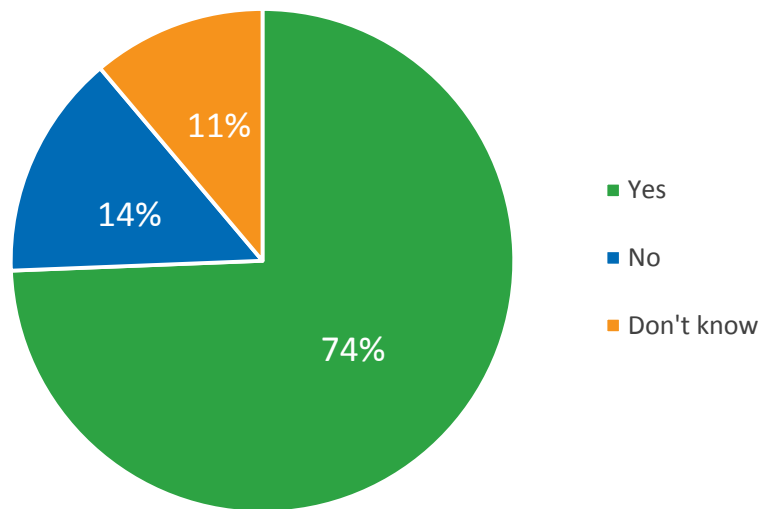
Based on an estimate that additional cost pressures to Tower Hamlets Council for adult social care services in 2021/22 will be £3.5m, respondents were asked, if permitted would they support an adult social care precept to support adult social care services.

Overall, the majority (56%) said they would support an adult social care precept to support adult social care services. Over a quarter (28%) said they would not support this proposal and 16% said they did not know.

Female respondents (58%) tended to be more supportive of the measure compared to males (55%) and three-fifths (60%) of White residents agreed with this action compared to just over half of BAME respondents (53%).

Respondents in Poplar (85%) and Spitalfields and Banglatown (69%) were most supportive of an adult social care precept compared to a third in Limehouse (37%) and St Peter's (33%). Trends were generally consistent between residents and businesses in the borough.

Do you support the council expanding this approach to income generation so we can continue to protect frontline services, and limit the impact of government cuts?



One of the ways Tower Hamlets Council already generates income is by hiring out unique council-owned assets such as parks for events and filming, and the use of venues for ceremonies and sporting activities. Its fees and charges are also compared against other councils, and the council is exploring more innovative ways to raise income. Respondents were asked if they support the council expanding this approach to income generation so they can continue to protect frontline services and limit the impact of government cuts.

Nearly three quarters (74%) agreed the council should expand on this approach to income generation. Less than a fifth (14%) felt they could not support this action and a tenth did not know (11%).

Those aged 55-64 (78%) were most inclined to support this proposal, an increase of nearly 10% when compared to young people, under 25 (69%). White respondents (77%) were more supportive of expanding this approach compared to BAME residents (72%).

More than 8 in every 10 respondents located in Spitalfields and Banglatown, St Dunstan's, Stepney Green and Poplar believed the council should expand this approach to income generation with Bromley North (56%) and Bow East (54%) less supportive. Furthermore, trends were generally consistent between residents and businesses in the borough.

5.0 Appendices

5.1 Questionnaire

Tower Hamlets Council

Budget Consultation 2020

Introduction

Good morning / afternoon / evening. My name is and I am calling / speaking to you on behalf of Tower Hamlets Council from SMSR Ltd, an independent research company.

We are speaking to residents in the borough to get their views on the Council's budget for next year.

Do you have a few minutes to get your thoughts on this today and help shape the budget in your local area?

In compliance with GDPR you are able to withdraw your consent at any point during or after the interview and we can provide contact details for both Tower Hamlets Council and SMSR at any point if you so wish. The data is being collected in accordance with the MRS Code of Conduct and will only be used by SMSR and Tower Hamlets Council. Data collected will not be used for marketing purposes and the interview will take around 10 minutes.

Your responses will remain strictly confidential and anonymous, and your personal details will not be forwarded to a third party. It should take approximately 10 minutes, and anonymised responses will be used by SMSR Ltd and Tower Hamlets Council.

If respondent wishes to check validity of research, offer the following contact details: SMSR Ltd - Freephone 0800 1380845 and speak to Amy Collier (Office Manager) or call the Market Research Society freephone on 0800 975 9596.

Q1 Are you responding to this consultation as:

- a local resident..... 1
- a local business 2
- a local community organisation..... 3
- other (please specify)..... 4

Please specify other:

INTERVIEWER PREAMBLE

This year Tower hamlets Council is spending £1.2 billion gross expenditure (£354.5 million net expenditure budget) on public services to support people and improve lives. Over half of its net budget is spent on supporting children and vulnerable adults.

Covid-19 has of course had a huge impact on the Council's services and finances and the budget was set in this context. The Council have worked hard to make £200m in savings since 2010, as their budget has been cut by the Government and they have been squeezed by additional demand.

The additional pressures that have now been experienced because of the pandemic means the Council will now have to save a further £30m by 2024.

The required savings are subject to significant uncertainty as this will depend on both the extent to which the Government provides additional funding for Covid-19 pressures, and the impact of the pandemic on income from council tax and business rates.

Despite challenges from budget cuts, increases in demand from vulnerable residents and a rising population, the Council are proud to have continued to invest in frontline services and have the seventh lowest council tax in London.

Tower Hamlets Council have made a number of tough choices to minimise the impact on those services residents have told us that they rely on the most. They have reduced running costs, been more efficient in how we deliver services, and reduced our workforce by a third since 2010.

The Council has to make the most of the money they have, as well as continuing to look at innovative ways to generate income.

This consultation is your chance to get involved in the budget conversations and to help the Council shape the future for all.

You may have received a budget booklet from the Council, which you can refer to during this consultation, if you wish

Q2 In your opinion, which council service(s) do you value the most?

(select up to three)

- Services for elderly and vulnerable adults 01
- Children's services and education 02
- Protecting and supporting vulnerable children 03
- Housing services..... 04
- Public health 05
- Culture, libraries and parks 06
- Community safety 07
- Highways and transport services 08
- Street cleaning, waste and public realm 09
- Economic growth and job creation 10

Q3a With limited resources available, please tell us which services you think the council should prioritise?

(select up to three)

- Services for elderly and vulnerable adults 01
- Children's services and education 02
- Protecting and supporting vulnerable children 03
- Housing services..... 04
- Public health 05
- Culture, libraries and parks 06
- Community safety 07
- Highways and transport services 08
- Street cleaning, waste and public realm 09
- Economic growth and job creation 10

Q3b Please tell us which of the options you think is most important to prioritise?

- Services for elderly and vulnerable adults 01
- Children's services and education 02
- Protecting and supporting vulnerable children 03
- Housing services..... 04
- Public health 05
- Culture, libraries and parks 06
- Community safety 07
- Highways and transport services 08
- Street cleaning, waste and public realm 09
- Economic growth and job creation 10

Q4 As core government funding continues to fall, the Council have to save a further £30m by 2024.

We have made savings in the following areas, but as we have to make additional savings, would you prefer that the council:

(select up to three)

- reduces spending across all services by the same proportion 1
- reduces spending on frontline services..... 2
- reduces spending on temporary agency staff 3
- reduces spending on the contracts that we procure for services 4
- reduces spending on non-statutory services (services the council is not legally required to provide)..... 5
- reduces costs by delivering more services using digital technology 6
- generates more commercial income and maximises use of assets (currently reduced due to impact of Covid-19) 7
- uses its one off resources such as reserves 8
- Other 9

Please specify other:

What do you think the impact of further savings on the borough will mean?

Q5 **Services.** Do you think the impact of further savings on the borough will mean:

- Fewer services will be available 1
- More services will be available..... 2

Q6 **Efficiency.** Do you think the impact of further savings on the borough will mean:

- Council will be less efficient 1
- Council will be more efficient..... 2

Q7 **Quality.** Do you think the impact of further savings on the borough will mean:

- Service quality will go down 1
- Service quality will improve 2

Q8 We are exploring a range of solutions to minimise the impact of the savings the council is required to make.

If we had to pursue just two options below, which are most important to you?

(select up to two)

- to work closely with organisations in the voluntary and community sector and partner organisations such as the NHS to deliver more joined up services 1
- to share services with neighbouring boroughs to make council services more efficient through greater use of digital technology 2
- to outsource services to the private sector 3
- to investigate better use of our assets and other ways to generate income 4
- to explore options for charging or raising fees for non-statutory council services (services we are not legally required to provide) 5
- Other (please specify) 6

Please specify other:

Council Tax currently funds around a third of our total budget (excluding schools) so it's a significant funding source for the services we provide. The Government has said it expects councils to increase their council tax rate by an amount every year to cover inflation. This increase partly helps to meet rising costs and demand for our services but will not be enough to fully cover the rising costs we have for 2021-22. Even with an increase in council tax, savings will still be needed to balance our budget.

In 2020/21, Tower Hamlets Council increased council tax by 1.99% and charged an adult social care precept of 2% so overall an increase of 3.99% which was the case in most other boroughs. The council has retained a local council tax reduction scheme that fully protects those residents on the lowest income from any council tax payment.

Every 1% increase in council tax that the council raises generates circa £1 million, which can be used to protect services. Each 1% rise in council tax costs households an average of 19p extra per week.

Q9 Would you be prepared to support a proposal to increase council tax?

- Yes 1
- No 2
- Don't know 3

Q10 Any council that wishes to raise council tax higher than a threshold set by central government will have to hold a local referendum.

At this stage it is unclear what the government threshold may be, but we would like to seek your view on which of the following council tax increases you would support most:

- I support an increase of between 0% and 2% 1
- I support an increase of between 2% and 3% 2
- I support an increase of between 3% and 4% 3
- I support an increase above 4% 4
- I do not support an increase 5
- Don't know 6

Q11 The government has allowed councils in the last four years to add an additional charge to their council tax for adult social care to support some of their most vulnerable residents. This is called the adult social care precept.

At this stage in the same way as for general council tax increases it is unclear whether, and if so at what level, any adult social care precept will be permitted.

We estimate that the additional cost pressures to the council for adult social care services in 2021/22 will be £3.5m.

The council has to meet these costs whether or not it increases council tax or other income, therefore if it doesn't increase its income, savings have to be found elsewhere.

If permitted, would you support an adult social care precept to support adult social care services?

- Yes 1
- No 2
- Don't know 3

Q12 The council is looking at ways it can generate income to contribute towards the budget shortfall and minimise the impact of cuts on our services.

One of the ways the council already generates income is by hiring out its unique council-owned assets such as parks for events and filming, the use of venues for ceremonies and sporting activities. We also continually compare our fees and charges against other councils and look at how we can be more innovative in raising income.

Do you support the council expanding this approach to income generation so we can continue to protect frontline services, and limit the impact of government cuts?

- Yes 1
- No 2
- Don't know 3

Demographics

Q13 How old are you?

- 0-15..... 01
- 16-24..... 02
- 25-34..... 03
- 35-44..... 04
- 45-54..... 05
- 55-64..... 06
- 65-74..... 07
- 75-84..... 08
- 85+..... 09
- Prefer not to say 10

Q14 Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months (include any problems related to old age)?

- Yes..... 1
- No 2
- Prefer not to say 3

Q15 Please state the type of health problem or disability that applies to you?

(People may experience more than one type of disability or health problem, in which case you may indicate more than one. If none of the categories applies, please mark 'Prefer to self-describe' and specify the type of health problem or disability.)

- Sensory impairment (such as being blind / having a visual impairment or being deaf / having a hearing impairment) 1
- Physical impairment (such as using a wheelchair to get around and / or difficulty using your arms) 2
- Learning disability (such as Downs syndrome or dyslexia) or cognitive impairment (such as autism or head-injury)..... 3
- Mental health condition, (such as depression or schizophrenia)..... 4
- Long-standing illness or health condition (such as cancer, HIV, diabetes, chronic heart disease, or epilepsy)..... 5
- Prefer not to say 6
- Prefer to self-describe (please specify):..... 7

Please specify other:

Q16 Which best describes your gender?

- Male 1
- Female 2
- Prefer not to say 3
- Prefer to self-describe (please specify):..... 4

Please specify:

Q17 Is your gender identity the same as the sex you were assigned to at birth?

- Yes 1
- No 2
- Prefer not to say 3

Q18 Which of the following describes your sex?

- Man 1
- Woman 2
- Intersex 3
- Prefer not to say 4
- Prefer to self-describe (please specify):..... 5

Please specify:

Q19 Which of the following describes your sexual orientation?

- Gay / lesbian 1
- Bi (attracted to more than one gender) 2
- Heterosexual / straight 3
- Prefer not to say 4
- Prefer to self-describe (please specify):..... 5

Please speify:

Q20 Are you legally married or in a civil partnership?

- Yes 1
- No 2
- Prefer not to say 3

Q21 Which best describes your current marital, civil partnership or cohabitation status?

- Single (never married or never registered a civil partnership) 01
- Married 02
- In a registered civil partnership 03
- Separated, but still legally married 04
- Separated, but still in a registered civil partnership 05
- Divorced 06
- Formerly in a registered civil partnership which is now dissolved 07
- Widowed 08
- Surviving partner from a registered civil partnership 09
- Cohabiting with a partner 10
- Prefer not to say 11

Q22 Are you currently pregnant or did you give birth in the last twelve months?

- Yes 1
- No 2
- Not applicable 3
- Prefer not to say 4

Q23 How would you describe your ethnic group?

- White: British..... 01
- White: Irish..... 02
- White: Traveller of Irish heritage 03
- White: Gypsy / Roma..... 04
- Any other White background..... 05
- Mixed: White and Black Caribbean 06
- Mixed: White and Black African..... 07
- Mixed: White and Asian 08
- Mixed: Any other Mixed background..... 09
- Asian / Asian British: Indian 10
- Asian / Asian British: Pakistani..... 11
- Asian / Asian British: Bangladeshi 12
- Chinese..... 13
- Vietnamese 14
- Any other Asian background 15
- Black / Black British: Somali 16
- Black / Black British: Other Africa..... 17
- Black / Black British: Caribbean..... 18
- Any other background..... 19
- Prefer not to say 20
- Any other Black background..... 21

Q24 What is your religion or belief system?

- Agnostic 01
- Buddhist 02
- Hindu 03
- Humanist 04
- Christian 05
- Jewish 06
- Muslim 07
- Sikh 08
- Prefer not to say 09
- No religion or belief 10
- Prefer to self-describe (please specify) 11

Please specify other:

Q25 Do you have caring or parenting responsibilities? (for example, childcare or dependent adults)

- Yes 1
- No 2
- Prefer not to say 3

Pcode Please may I take your postcode?

Q26 Tower Hamlets residents' e-newsletter contains the latest news, events, competitions and special offers from across Tower Hamlets. Would you like to sign up to our residents newsletter?

- Yes 1
- No 2

Q26 Thank you. Please can I take your name and email address?

Name	
Email	

Bus1 How many employees work in your organisation?

- 1-10..... 1
- 11-49..... 2
- 50-249..... 3
- 250 or more 4

Bus2 What type of business do you operate?

- Financial or insurance 01
- Professional, scientific or technical 02
- Business administration and support services 03
- Information and communication 04
- Health 05
- Education 06
- Accommodation and food services 07
- Public administration and defence 08
- Retail..... 09
- Arts, entertainment and leisure 10
- Wholesale 11
- Construction..... 12
- Property 13
- Transport, storage and postage 14
- Manufacturing 15
- Motor trades..... 16
- Other (please specify):..... 17

Thank you for completing this questionnaire.

READ OUT:

If respondent wishes to check validity of research, offer the following contact details: SMSR Ltd - Freephone 0800 1380845 and speak to Amy Collier (Office Manager) or call the Market Research Society freephone on 0800 975 9596.

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