



Meeting of the

# TOWER HAMLETS COUNCIL

---

Wednesday, 21 February 2018 at 7.00 p.m.

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## A G E N D A

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### VENUE

Council Chamber, 1<sup>st</sup> Floor,  
Town Hall, Mulberry Place,  
5 Clove Crescent,  
London E14 2BG

#### **Democratic Services Contact:**

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Directorate of Governance

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**TO THE MAYOR AND COUNCILLORS OF THE LONDON BOROUGH OF TOWER  
HAMLETS**

You are summoned to attend a meeting of the Council of the London Borough of Tower Hamlets to be held in **THE COUNCIL CHAMBER, 1ST FLOOR, TOWN HALL, MULBERRY PLACE, 5 CLOVE CRESCENT, LONDON, E14 2BG** at 7.00 p.m. on **WEDNESDAY, 21 FEBRUARY 2018**

Will Tuckley  
**Chief Executive**



## Public Information

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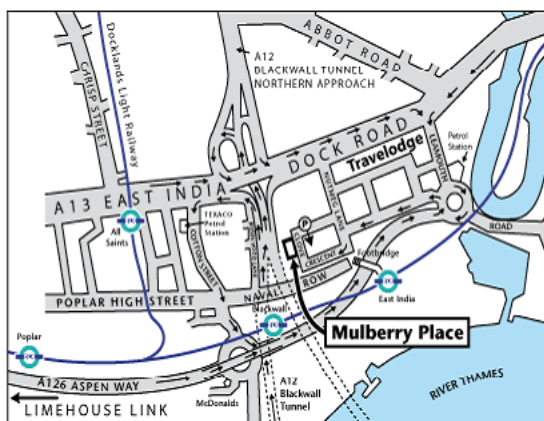
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**LONDON BOROUGH OF TOWER HAMLETS**

**COUNCIL**

**WEDNESDAY, 21 FEBRUARY 2018**

**7.00 p.m.**

**PAGE  
NUMBER**

**1. APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

**2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS**

**7 - 10**

To note any declarations of interest made by Members, including those restricting Members from voting on the questions detailed in Section 106 of the Local Government Finance Act, 1992. See attached note from the Monitoring Officer.

**3. TO RECEIVE ANNOUNCEMENTS (IF ANY) FROM THE SPEAKER OF THE COUNCIL OR THE CHIEF EXECUTIVE**

**4. TO RECEIVE PETITIONS**

The Council Procedure Rules provide for a maximum of four petitions to be presented at the Budget Council meeting.

The deadline for receipt of petitions for this Council meeting was noon on Wednesday 7 February 2018. No petitions were received by the deadline.

**5. BUDGET AND COUNCIL TAX 2018/19**

**11 - 252**

To consider the proposals of the Mayor and Executive for the Council's Budget and Council Tax 2018/19. Please note that this report includes the General Fund Revenue and Capital Budget and Medium Term Financial Plan Plan 2018/19 - 2020/21, the Housing Revenue Account and the Treasury Management Strategy Statement.

**6. SUBMISSION OF THE TOWER HAMLETS LOCAL PLAN  
2031: MANAGING GROWTH AND SHARING THE  
BENEFITS**

**253 - 624**

To consider the report of the Acting Corporate Director, Place, proposing the submission of the regulation 19 version of the Tower Hamlets Local Plan, associated minor amendments table and supporting documentation to the Secretary of State for independent examination in accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

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# Agenda Item 2

## **DECLARATIONS OF INTERESTS - NOTE FROM THE MONITORING OFFICER**

This note is for guidance only. For further details please consult the Members' Code of Conduct at Part 5.1 of the Council's Constitution.

Please note that the question of whether a Member has an interest in any matter, and whether or not that interest is a Disclosable Pecuniary Interest, is for that Member to decide. Advice is available from officers as listed below but they cannot make the decision for the Member. If in doubt as to the nature of an interest it is advisable to seek advice **prior** to attending a meeting.

### **Interests and Disclosable Pecuniary Interests (DPIs)**

You have an interest in any business of the authority where that business relates to or is likely to affect any of the persons, bodies or matters listed in section 4.1 (a) of the Code of Conduct; and might reasonably be regarded as affecting the well-being or financial position of yourself, a member of your family or a person with whom you have a close association, to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the ward affected.

You must notify the Monitoring Officer in writing of any such interest, for inclusion in the Register of Members' Interests which is available for public inspection and on the Council's Website.

Once you have recorded an interest in the Register, you are not then required to declare that interest at each meeting where the business is discussed, unless the interest is a Disclosable Pecuniary Interest (DPI).

A DPI is defined in Regulations as a pecuniary interest of any of the descriptions listed at **Appendix A** overleaf. Please note that a Member's DPIs include his/her own relevant interests and also those of his/her spouse or civil partner; or a person with whom the Member is living as husband and wife; or a person with whom the Member is living as if they were civil partners; if the Member is aware that that other person has the interest.

### **Effect of a Disclosable Pecuniary Interest on participation at meetings**

Where you have a DPI in any business of the Council you must, unless you have obtained a dispensation from the authority's Monitoring Officer following consideration by the Dispensations Sub-Committee of the Standards Advisory Committee:-

- not seek to improperly influence a decision about that business; and
- not exercise executive functions in relation to that business.

If you are present at a meeting where that business is discussed, you must:-

- Disclose to the meeting the existence and nature of the interest at the start of the meeting or when the interest becomes apparent, if later; and
- Leave the room (including any public viewing area) for the duration of consideration and decision on the item and not seek to influence the debate or decision

When declaring a DPI, Members should specify the nature of the interest and the agenda item to which the interest relates. This procedure is designed to assist the public's understanding of the meeting and to enable a full record to be made in the minutes of the meeting.

Where you have a DPI in any business of the authority which is not included in the Member's register of interests and you attend a meeting of the authority at which the business is considered, in addition to disclosing the interest to that meeting, you must also within 28 days notify the Monitoring Officer of the interest for inclusion in the Register.

**Further advice**

For further advice please contact:-

Asmat Hussain, Corporate Director, Governance and Monitoring Officer. Tel 020 7364 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	<p>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.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.</p>
Contracts	<p>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—</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
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	<p>Any tenancy where (to the Member's knowledge)—</p> <p>(a) the landlord is the relevant authority; and</p> <p>(b) the tenant is a body in which the relevant person has a beneficial interest.</p>
Securities	<p>Any beneficial interest in securities of a body where—</p> <p>(a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(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.</p>

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Non-Executive Report of the:  <b>COUNCIL</b>  21 February 2018	 <b>TOWER HAMLETS</b>
<b>Report of:</b> Zena Cooke, Corporate Director, Resources	<b>Classification:</b> Unrestricted
<b>Budget and Council Tax 2018-19 – Report of the Cabinet Meeting, 30 January 2018 and Budget Proposals of the Mayor and Executive</b>	

<b>Originating Officer(s)</b>	Neville Murton, Divisional Director, Divisional Director, Finance, Procurement & Audit
<b>Wards affected</b>	All Wards

## 1. SUMMARY

- 1.1 This report sets out the proposals of the Mayor and Executive for the council's Budget and Council Tax 2018-19, as agreed at the Cabinet Meeting on 30<sup>th</sup> January 2018.

## 2. RECOMMENDATIONS

- 2.1 In accordance with the decisions of the Mayor in Cabinet as set out at section 5 below, Full Council is **recommended**:-

### **General Fund Capital and Revenue Budgets and Medium Term Financial Plan 2018-21**

- (a) To note the feedback from the budget consultation as detailed in section 3.13, appendix 10 of the budget report and published on the council's website.
- (b) To agree a General Fund Revenue Budget of £343.730m and a Council Tax (Band D) of £986.14 for 2018-19 as set out in the motion attached at Annex 1 to this report. This incorporates a 2% increase in respect of the Adult Social Care 'Precept'.
- (c) To note an increase of £916k in the General Fund Revenue budget 2018-19 as a result of the final settlement announcement in February 2018. The increase is due to additional funding through the Adult Social Care Support Grant
- (d) To note the Business Rates income includes the RSG element in 2018-19 only, additional income and net adjustments for tariff and payment due to London councils. The RSG amounts remain as stated separately for 2019-20 and 2020-21 respectively.

- (e) To note the change in Retained Business Rates income due to the final completion of the NNDR 1 return on the 24<sup>th</sup> January 2018; And the inclusion of the estimated outturn position in relation to the 2017-18 financial year.
- (f) To note the additional requirement of £340k from General fund reserves to balance the budget in 2018-19
- (g) To note that a revised Proforma has been included for MPG /HAC01/18-19 - Community Safety, ASB & Crime.
- (h) To note the Mayor in Cabinet agreed that a review of savings proposal 'CHI 003/17-18' relating to 'Widening Participation in Early Years' agreed in the 2017-18 budget to take place and for further information on the impact on affordability and level of provision for under 5s to be provided
- (i) To agree a Capital programme and Medium Term Financial Plan as set out in the motion attached at Annex 1 to this report.

**Treasury Management Strategy Statement, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2018-19**

- (j) To adopt (as also set out in the motion at Annex 1):
  - The Treasury Management Strategy Statement set out in section 5 and 6 of the report and Annex 4 to this report;
  - The Annual Investment Strategy set out in section 7 of the report at Annex 4 to this report;
  - The Minimum Revenue Provision Policy Statement set out in section 2 of the report at Annex 4 to this report, which officers involved in treasury management must then follow.

**Section 25, Local Government Act 2003**

- (k) To note that in line with the requirements of the Local Government Act 2003, the Corporate Director of Resources is of the view that:
  - a) The General Fund balances of £28m and the level of reserves are adequate to meet the council's financial needs for 2018-19, and that in light of the economic risks that the council faces, they should not fall below a minimum level of £20m; and
  - b) The General Fund estimates are sufficiently robust to set a balanced budget for 2018-19. This takes into account the adequacy of the level of balances and reserves outlined above and the assurance gained from the comparisons of the 2017-18 budget with the projected spend identified in monitoring reports. The overall level of the corporate contingency has been set at

£3.1m, which is adequate to cover any potential costs arising from unforeseen events or cost pressures.

### **Local Council Tax Reduction Scheme (LCTRS)**

- (l) To note that The Mayor in Cabinet agreed a report on the 9th January 2018 which proposed no changes to the 2017-18 Local Council Tax Reduction Scheme (LCTRS).

### **3. CABINET MEETING, 30<sup>th</sup> JANUARY 2018**

- 3.1 The Cabinet received the report of the Corporate Director Resources on the General Fund Capital and Revenue Budgets and Medium Term Financial Plan 2018-21.
- 3.2 In considering the information in the reports, the Mayor and Cabinet took into account the comments of the Overview and Scrutiny Committee (OSC) on the Mayor's initial budget proposals for 2018-19 (which had been published in the 9<sup>th</sup> January Cabinet agenda), from the OSC meeting held on 15<sup>th</sup> January 2018.
- 3.3 The Mayor and Cabinet also took into account feedback from the budget consultation process and events.
- 3.4 The Mayor in Cabinet agreed that a review of savings proposal 'CHI 003/17-18' relating to 'Widening Participation in Early Years' agreed in the 2017-18 budget to take place and for further information on the impact on affordability and level of provision for under 5s to be provided.
- 3.5 The Mayor in Cabinet also agreed to authorise the Corporate Director, Resources after consultation with the Mayor and Lead Member of Resources to make any changes required to the budget following the final settlement announcement in February.

### **4. LEGAL COMMENTS**

- 4.1 The legal comments are set out in the reports to Cabinet which are appended and there are no additional comments to be added.

### **5. DOCUMENTS ATTACHED**

- 5.1 The following documents are attached to this report for the Council's consideration:-

Annex 1: Budget Motion from Councillor David Edgar, Cabinet Member for Resources

Annex 2: Report of the Corporate Director Resources: General Fund Capital and Revenue Budgets and Medium Term Financial Plan 2018-2021

Annex 3: Appendices 1 - 10 to the above report:-

- Appendix 1A Summary of the Medium Term Financial Strategy
- Appendix 1B Detailed analysis of the Medium Term Financial Strategy by Service Area
- Appendix 2 Tower Hamlets Core Spending Power
- Appendix 3 New growth proposals 2018- 2021
- Appendix 4 New Savings proposals 2018- 2021
- Appendix 5 Reserves Policy
- Appendix 6 Risk Evaluation
- Appendix 7 Projected Movement in Reserves
- Appendix 8A Draft Housing Revenue Account Medium Term Financial Strategy 2018-2023
- Appendix 8B Indicative THH Housing Capital Programme 2018-2023
- Appendix 9A Current Capital programme 2017-2028
- Appendix 9B Increases to Existing Schemes & New Schemes 2018-2028
- Appendix 9C Summary of Proposed Capital Programme 2017-2028
- Appendix 9D Proposed New Schemes 2018-2028
- Appendix 10 Budget Consultation Feedback

Annex 4: Report of the Corporate Director Resources to the Audit Committee 23rd January 2018: Treasury Management Strategy Statement, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2018-19 (Report presented to Full Council includes subsequent minor amendments made by officers).

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**LOCAL GOVERNMENT ACT 1972 – SECTION 100D (AS AMENDED)**

**LIST OF "BACKGROUND PAPERS" USED IN THE PREPARATION OF THIS REPORT**

**Brief description  
of "background paper"**

**Tick if copy  
supplied**

**If not supplied,  
name and telephone  
number of holder**

No unpublished background papers were relied upon to a material extent in the preparation of this report.

**BUDGET COUNCIL**

**21<sup>st</sup> February 2018**

**COUNCIL TAX REQUIREMENT 2018-19**

**BUDGET MOTION FROM COUNCILLOR DAVID EDGAR,  
CABINET MEMBER FOR RESOURCES**

***I propose the following motion in relation to Agenda item 5: "Report of the Mayor in Cabinet on 30<sup>th</sup> January 2018:-***

**That Council: -**

**General Fund Revenue Budget and Council Tax Requirement 2018-19**

1. Agree a General Fund revenue budget of £343.730m and a total Council Tax Requirement for Tower Hamlets in 2018-19 of £93.777m as set out in the table below.

Service	Total	Savings			Growth		Adjustments		Total
	2017-18 £'000	Approved £'000	Prior year deleted £'000	New £'000	Approved £'000	New £'000	Approved £'000	New £'000	2018-19 £'000
Health, Adult & Community	105,985	(1,985)	717	-	2,057	697	(2,821)	316	104,966
Public Health	33,521	(749)	-	-	(925)	-	-	-	31,847
Children Services	103,462	(2,313)	339	(300)	(135)	879	6	4,718	106,657
Place	64,610	(2,285)	200	-	578	(141)	1,823	1,392	66,176
Governance	12,751	(4)	-	-	-	-	-	100	12,847
Resources	25,095	(2,075)	-	-	(252)	80	(7,213)	615	16,250
<b>Net Service Costs</b>	<b>345,424</b>	<b>(9,410)</b>	<b>1,256</b>	<b>(300)</b>	<b>1,323</b>	<b>1,515</b>	<b>(8,205)</b>	<b>7,141</b>	<b>338,743</b>
<b>Other Net Costs</b>									
Capital Charges	6,997	-	-	(1,458)	-	-	-	-	5,539
Levies	1,796	-	-	-	-	-	-	-	1,796
Pensions	13,290	-	-	-	-	-	-	-	13,290
Corporate Contingency	3,150	-	-	-	-	-	-	-	3,150
Other Corporate Costs	(25,097)	(4,150)	-	-	196	(1,860)	5,270	-	(25,642)
<b>Total Other Net costs</b>	<b>135</b>	<b>(4,150)</b>	<b>-</b>	<b>(1,458)</b>	<b>196</b>	<b>(1,860)</b>	<b>5,270</b>	<b>-</b>	<b>(1,867)</b>
<b>Inflation</b>	<b>354</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>4,231</b>	<b>2,269</b>	<b>-</b>	<b>-</b>	<b>6,854</b>
<b>Total Financing Requirement</b>	<b>345,913</b>	<b>(13,560)</b>	<b>1,256</b>	<b>(1,758)</b>	<b>5,750</b>	<b>1,924</b>	<b>(2,935)</b>	<b>7,141</b>	<b>343,730</b>
<b>Funding</b>									
Revenue Support Grant									
Retained Business Rates	(185,265)	(4,100)	-	-	-	8,275	-	-	(181,090)
Business Rates (London Pilot)	-	-	-	-	-	(8,000)	-	-	(8,000)
Council Tax	(85,837)	-	-	(7,940)	-	-	-	-	(93,777)
Collection Fund Surplus	-	-	-	-	-	-	-	-	-
- Council Tax	(1,000)	-	-	(1,500)	1,000	-	-	-	(1,500)
- Retained Business Rates	-	-	-	-	-	11,357	-	-	11,357
<b>Core Grants</b>									
- Public Health Grant	(35,974)	-	-	-	925	-	-	-	(35,049)
- NHB	(19,330)	(5,000)	-	-	20,407	-	-	-	(3,923)
- Strategic School Improvement Fund	(2,772)	-	-	-	2,572	-	-	-	(200)
- Improved Better Care fund	(1,640)	-	-	(6,071)	-	-	-	-	(7,711)
- Additional Improved Better Care Fund grant (NEW)	(7,017)	-	-	-	-	-	2,821	-	(4,196)
- Adult Social Care Support Grant	(1,500)	-	-	-	1,500	(916)	-	-	(916)
- Local Lead Flood	(32)	(2)	-	-	-	-	-	-	(34)
<b>Reserves</b>									
- Earmarked (Corporate)	(6,094)	-	-	-	-	-	114	(7,141)	(13,121)
- General Fund (Smoothing)	-	-	-	-	-	-	-	-	-
<b>Total Financing</b>	<b>(346,460)</b>	<b>(9,102)</b>	<b>-</b>	<b>(15,512)</b>	<b>26,404</b>	<b>10,717</b>	<b>2,935</b>	<b>(7,141)</b>	<b>(338,160)</b>

2. Agree a Council Tax for Tower Hamlets in 2018-19 of £986.14 at Band D resulting in a Council Tax for all other band taxpayers, before any discounts, and excluding the GLA precept, as set out in the table below:-

This incorporates a 2% increase on the previous year in respect of the Adult Social Care 'Precept' announced by the government in the 2017 budget.

BAND	PROPERTY VALUE		RATIO TO BAND D	LBTH COUNCIL TAX FOR EACH BAND £
	FROM £	TO £		
A	0	40,000	6/9	657.43
B	40,001	52,000	7/9	767.00
C	52,001	68,000	8/9	876.57
D	68,001	88,000	9/9	986.14
E	88,001	120,000	11/9	1,205.28
F	120,001	160,000	13/9	1,424.42
G	160,001	320,000	15/9	1,643.57
H	320,001	and over	18/9	1,972.28

3. Agree that for the London Borough of Tower Hamlets in 2018-19:-

(a) The Council Tax for Band D taxpayers, before any discounts, and including the GLA precept, shall be **£1,280.37** as shown below: -.

<b>£</b>	
<b>(Band D, No Discounts)</b>	
LBTH	986.14
GLA	294.23
Total	1,280.37

(b) The Council Tax for taxpayers in all other bands, before any discounts, and including the GLA precept, shall be as detailed in the table below: -

BAND	PROPERTY VALUE		RATIO TO BAND D	LBTH £	GLA £	TOTAL £
	FROM £	TO £				
A	0	40,000	6/9	657.43	196.15	853.58
B	40,001	52,000	7/9	767.00	228.85	995.85
C	52,001	68,000	8/9	876.57	261.54	1,138.11
D	68,001	88,000	9/9	986.14	294.23	1,280.37
E	88,001	120,000	11/9	1,205.28	359.61	1,564.89
F	120,001	160,000	13/9	1,424.42	425.00	1,849.42
G	160,001	320,000	15/9	1,643.57	490.38	2,133.95
H	320,001	and over	18/9	1,972.28	588.46	2,560.74

4 Approve the statutory calculations of this Authority's Council Tax Requirement in 2018-19, detailed in **Appendix A** to this motion, undertaken by the Corporate Director Resources (Chief Financial Officer) in accordance with the requirements of Sections 31 to 36 of the Local Government Finance Act 1992.

- 5 Approve the Treasury Management Strategy Statement, the Annual Investment Strategy and the Minimum Revenue Provision Policy Statement as presented to Audit Committee on 23 January 2018.
- 6 Approve the General Fund Capital and Revenue Budgets and Medium Term Financial Plan 2018-2021 as amended following final settlement announcement as agreed by the Mayor in Cabinet on 30 January as set out in the attached report of the Mayor in Cabinet and summarised in the tables below.

### Summary of Medium Term Financial Plan 2017-2021

	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
<b>Net Service Costs</b>	361,985	345,913	343,730	331,895
<b>Growth</b>				
Approved	(16,344)	(1,416)	1,053	(7,458)
New	15,517	6,796	(6,215)	7,515
<b>Savings</b>				
Approved	-	(13,560)	(13,174)	
Prior Year - deleted		1,256		
New	(20,396)	(1,758)	-	(9,030)
<b>Inflation</b>	5,150	6,500	6,500	6,500
<b>Total Funding Requirement</b>	<b>345,913</b>	<b>343,730</b>	<b>331,895</b>	<b>329,422</b>
<b>Revenue Support Grant</b>	(53,958)	-	(33,281)	(30,498)
<b>Retained Business Rates</b>	(131,307)	(181,090)	(139,555)	(139,555)
<b>Business Rates (London Pilot)</b>	-	(8,000)	-	-
<b>Council Tax</b>	(85,837)	(93,777)	(98,030)	(103,756)
<b>Collection Fund Surplus</b>				
Council Tax	(1,000)	(1,500)	-	-
Retained Business Rates	-	11,357	-	-
<b>Core Grants</b>	(68,265)	(52,029)	(52,588)	(50,478)
<b>Earmarked Reserves</b>	(6,094)	(13,121)	(7,577)	(5,465)
<b>Total Funding</b>	<b>(346,460)</b>	<b>(338,160)</b>	<b>(331,032)</b>	<b>(329,753)</b>
<b>Budget Gap (excl use of Reserves)</b>	(548)	5,570	863	(331)
<b>Unallocated Contingencies</b>	-	-	-	-
<b>Budgeted Reserve Contribution GF smoothing (Approved Feb 2017)</b>	548	(5,459)		-
<b>Budgeted Reserve Contribution</b>	(0)	(111)	(863)	331
<b>Unfunded Gap</b>	-	0	-	-
	<b>31/03/2018</b>	<b>31/03/2019</b>	<b>31/03/2020</b>	<b>31/03/2021</b>
<b>Balance on General Fund Reserves (£000s)</b>	32,288	26,718	25,855	26,186



## Detailed Analysis of the Medium Term Financial Plan by Service Area 2017-18 to 2020-21

Service	Total	Savings			Growth		Adjustments		Total	Savings		Growth		Adjustments		Total	Savings		Growth		Adjustments		Total
	2017-18	Approved	Prior year deleted	New	Approved	New	Approved	New	2018-19	Approved	New	Approved	New	Approved	New	2019-20	Approved	New	Approved	New	Approved	New	2020-21
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Health, Adult & Community	105,985	(1,985)	717	-	2,057	697	(2,821)	316	104,966	(2,242)	-	2,125	814	(2,122)	(43)	103,498	-	(1,000)	-	3,499	(2,074)	4	103,927
Public Health	33,521	(749)	-	-	(925)	-	-	-	31,847	(411)	-	(730)	-	-	-	30,706	-	-	-	-	-	-	30,706
Children Services	103,462	(2,313)	339	(300)	(135)	879	6	4,718	106,657	(3,011)	-	(414)	-	(370)	(4,487)	98,375	-	(650)	-	-	(2,120)	2,000	97,605
Place	64,610	(2,285)	200	-	578	(141)	1,823	1,392	66,176	(1,781)	-	577	132	(225)	(219)	64,660	-	(580)	-	744	(1,598)	(98)	63,128
Governance	12,751	(4)	-	-	-	-	-	100	12,847	(4)	-	-	-	-	-	12,843	-	-	-	-	-	-	12,843
Resources	25,095	(2,075)	-	-	(252)	80	(7,213)	615	16,250	(525)	-	-	-	-	(200)	15,525	-	(1,900)	-	-	(1,666)	1,367	13,326
<b>Net Service Costs</b>	<b>345,424</b>	<b>(9,410)</b>	<b>1,256</b>	<b>(300)</b>	<b>1,323</b>	<b>1,515</b>	<b>(8,205)</b>	<b>7,141</b>	<b>338,743</b>	<b>(7,974)</b>	<b>-</b>	<b>1,558</b>	<b>946</b>	<b>(2,717)</b>	<b>(4,949)</b>	<b>325,608</b>	<b>-</b>	<b>(4,130)</b>	<b>-</b>	<b>4,243</b>	<b>(7,458)</b>	<b>3,272</b>	<b>321,535</b>
<b>Other Net Costs</b>																							
Capital Charges	6,997	-	-	(1,458)	-	-	-	-	5,539	-	-	-	-	-	-	5,539	-	-	-	-	-	-	5,539
Levies	1,796	-	-	-	-	-	-	-	1,796	-	-	-	-	-	-	1,796	-	-	-	-	-	-	1,796
Pensions	13,290	-	-	-	-	-	-	-	13,290	-	-	-	-	-	-	13,290	-	-	-	-	-	-	13,290
Corporate Contingency	3,150	-	-	-	-	-	-	-	3,150	-	-	-	-	-	-	3,150	-	-	-	-	-	-	3,150
Other Corporate Costs	(25,097)	(4,150)	-	-	196	(1,860)	5,270	-	(25,642)	(5,200)	-	2,212	(2,212)	-	(30,842)	-	(4,900)	-	-	-	-	-	(35,742)
<b>Total Other Net costs</b>	<b>135</b>	<b>(4,150)</b>	<b>-</b>	<b>(1,458)</b>	<b>196</b>	<b>(1,860)</b>	<b>5,270</b>	<b>-</b>	<b>(1,867)</b>	<b>(5,200)</b>	<b>-</b>	<b>2,212</b>	<b>(2,212)</b>	<b>-</b>	<b>(7,067)</b>	<b>-</b>	<b>(4,900)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(11,967)</b>
<b>Inflation</b>	<b>354</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>4,231</b>	<b>2,269</b>	<b>-</b>	<b>-</b>	<b>6,854</b>	<b>-</b>	<b>-</b>	<b>4,440</b>	<b>2,060</b>	<b>-</b>	<b>-</b>	<b>13,354</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>6,500</b>	<b>-</b>	<b>-</b>	<b>19,854</b>
<b>Total Financing Requirement</b>	<b>345,913</b>	<b>(13,560)</b>	<b>1,256</b>	<b>(1,758)</b>	<b>5,750</b>	<b>1,924</b>	<b>(2,935)</b>	<b>7,141</b>	<b>343,730</b>	<b>(13,174)</b>	<b>-</b>	<b>8,210</b>	<b>794</b>	<b>(2,717)</b>	<b>(4,949)</b>	<b>331,895</b>	<b>-</b>	<b>(9,030)</b>	<b>-</b>	<b>10,743</b>	<b>(7,458)</b>	<b>3,272</b>	<b>329,422</b>
<b>Funding</b>																							
Revenue Support Grant													(33,281)	-	-	(33,281)		2,783	-	-	-	-	(30,498)
Retained Business Rates	(185,265)	(4,100)	-	-	-	8,275	-	-	(181,090)	101,821	-	-	(60,286)	-	-	(139,555)	-	-	-	-	-	-	(139,555)
Business Rates (London Pilot)	-	-	-	-	-	(8,000)	-	-	(8,000)	-	-	-	8,000	-	-	-	-	-	-	-	-	-	-
Council Tax	(85,837)	-	-	(7,940)	-	-	-	-	(93,777)	-	(4,253)	-	-	-	-	(98,030)	-	(5,726)	-	-	-	-	(103,756)
<b>Collection Fund Surplus</b>																							
- Council Tax	(1,000)	-	-	(1,500)	1,000	-	-	-	(1,500)	-	-	-	1,500	-	-	-	-	-	-	-	-	-	-
- Retained Business Rates	-	-	-	-	-	11,357	-	-	11,357	-	-	-	(11,357)	-	-	(0)	-	-	-	-	-	-	(0)
<b>Core Grants</b>																							
- Public Health Grant	(35,974)	-	-	-	925	-	-	-	(35,049)	-	-	730	-	-	-	(34,319)	-	-	-	-	-	-	(34,319)
- NHB	(19,330)	(5,000)	-	-	20,407	-	-	-	(3,923)	(5,000)	-	5,741	-	-	-	(3,182)	-	-	-	-	-	-	(3,182)
- Strategic School Improvement Fund	(2,772)	-	-	-	2,572	-	-	-	(200)	-	-	-	-	-	-	(200)	-	-	-	-	-	-	(200)
- Improved Better Care fund	(1,640)	-	-	(6,071)	-	-	-	-	(7,711)	-	(5,066)	-	-	-	-	(12,777)	-	-	-	-	-	-	(12,777)
- Additional Improved Better Care Fund grant (NEW)	(7,017)	-	-	-	-	-	2,821	-	(4,196)	-	-	-	-	2,122	(2,074)	-	-	-	-	-	2,074	-	-
- Adult Social Care Support Grant	(1,500)	-	-	-	1,500	(916)	-	-	(916)	-	-	-	916	-	-	-	-	-	-	-	-	-	-
- Local Lead Flood	(32)	(2)	-	-	-	-	-	-	(34)	(2)	-	-	-	-	(36)	-	36	-	-	-	-	-	(0)
<b>Reserves</b>																							
- Earmarked (Corporate)	(6,094)	-	-	-	-	-	114	(7,141)	(13,121)	-	-	-	-	595	4,949	(7,577)	-	-	-	-	5,384	(3,272)	(5,465)
- General Fund (Smoothing)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total Financing</b>	<b>(346,460)</b>	<b>(9,102)</b>	<b>-</b>	<b>(15,512)</b>	<b>26,404</b>	<b>10,717</b>	<b>2,935</b>	<b>(7,141)</b>	<b>(338,160)</b>	<b>96,819</b>	<b>(9,319)</b>	<b>6,471</b>	<b>(94,509)</b>	<b>2,717</b>	<b>4,949</b>	<b>(331,032)</b>	<b>-</b>	<b>(2,907)</b>	<b>-</b>	<b>-</b>	<b>7,458</b>	<b>(3,272)</b>	<b>(329,753)</b>

**LONDON BOROUGH OF TOWER HAMLETS  
COUNCIL 21<sup>st</sup> FEBRUARY 2018  
BUDGET & COUNCIL TAX STATUTORY CALCULATIONS**

**SETTING THE AMOUNT OF COUNCIL TAX FOR THE COUNCIL'S AREA**

1. That the revenue estimates for 2018-19 be approved.
2. That it be noted that, at its meeting on 9<sup>th</sup> January 2018, Cabinet calculated 95,095 as its Council Tax base for the year 2018-19 [Item T in the formula in Section 31B of the Local Government Finance Act 1992, as amended (the "Act")]
3. That the following amounts be now calculated by the council for the year 2018-19 in accordance with Section 31 to 36 of the Local Government Finance Act 1992 as amended and the Local Authorities (Alteration of Requisite Calculations) (England) Regulations 2011:
  - (a) £1,285,757,063 Being the aggregate of the amounts which the council estimates for the items set out in Section 31A(2) of The Act. [Gross Expenditure]
  - (b) £1,191,980,080 Being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(3) of The Act. [Gross Income]
  - (c) £93,776,983 Being the amount by which the aggregate at 3(a) above exceeds the aggregate at 3(b) above, calculated by the Council, in accordance with Section 31A(4) of The Act, as its council tax requirement for the year. (Item R in the formula in Section 31B of The Act). [Council Tax Requirement]
  - (d) £986.14 Being the amount at 3(c) above (Item R), all divided by Item T (2 above), calculated by the Council, in accordance with Section 31B(1) of The Act, as the basic amount of its Council Tax for the year. [Council Tax]

**LONDON BOROUGH OF TOWER HAMLETS  
COUNCIL 21<sup>st</sup> FEBRUARY 2018  
BUDGET & COUNCIL TAX STATUTORY CALCULATIONS**

(e)	<b>VALUATION BAND</b>	<b>LBTH £</b>
	A	657.43
	B	767.00
	C	876.57
	D	986.14
	E	1,205.28
	F	1,424.42
	G	1,643.57
	H	1,972.28

Being the amount given by multiplying the amount at 3(d) above by the number which, in the proportion set out in Section 5(1) of The Act, is applicable to dwellings listed in a particular valuation band divided by the number which in that proportion is applicable to dwellings listed in valuation band D, calculated by the Council, in accordance with Section 36(1) of The Act, as the amount to be taken into account for the year in respect of categories of dwellings listed in different valuation bands.

4. That it be noted that for the year 2018-19 the Greater London Authority has stated the following amounts in precepts issued to the council, in accordance with Section 40 of the Local Government Finance Act 1992, for each of the categories of dwellings shown below:-


<b>VALUATION BAND</b>	<b>GLA £</b>
A	196.15
B	228.85
C	261.54
D	294.23
E	359.61
F	425.00
G	490.38
H	588.46

**LONDON BOROUGH OF TOWER HAMLETS  
COUNCIL 21<sup>st</sup> FEBRUARY 2018  
BUDGET & COUNCIL TAX STATUTORY CALCULATIONS**

5. That, having calculated the aggregate in each case of the amounts at 3(d) and 4 above, the council, in accordance with Section 30(2) of the Local Government Finance Act 1992, hereby sets the following amounts as the amounts of Council Tax for the year 2018-19 for each of the categories of dwellings shown below:-

<b>VALUATION BAND</b>	<b>TOTAL COUNCIL TAX £</b>
A	853.58
B	995.85
C	1,138.11
D	1,280.37
E	1,564.89
F	1,849.42
G	2,133.95
H	2,560.74

6. That the council hereby determines in accordance with Section 52ZB of the Local Government Finance Act 1992, that its relevant basic amount of Council Tax for 2018-19 is not excessive in accordance with the principles approved by the Secretary of State under Section 52ZC of the Local Government Finance Act 1992. As the billing authority, the council has not been notified by a major precepting authority that its relevant basic amount of Council Tax for 2018-19 is excessive and that the billing authority is not required to hold a referendum in accordance with Section 52ZK of the Local Government Finance Act 1992.

<b>Cabinet</b>  30 <sup>th</sup> January 2018	 <b>TOWER HAMLETS</b>
<b>Report of:</b> Zena Cooke, Corporate Director of Resources	<b>Classification:</b> Unrestricted
<b>The Council's 2018-19 Budget Report and Medium Term Financial Strategy 2018-21</b>	

Lead Member	Councillor David Edgar, Cabinet Member for Resources
Originating Officer(s)	Neville Murton
Wards affected	All wards
Key Decision?	Yes
Community Plan Theme	One Tower Hamlets

## EXECUTIVE SUMMARY

In February 2017, and following a rigorous process to establish the options for closing an estimated £58m budget gap, the Council agreed a 3 year budget and Medium Term Financial Strategy (MTFS) for the period 2017-2020, which included specific actions and approval for agreed savings of £52m that would need to be delivered to achieve a balanced budget over that period.

As part of the Council's annual budget cycle, this report reviews and updates the assumptions made in that report for the years 2018-2020 and incorporates a new year, 2020-21, to maintain the Council's three year MTFS.

The assumptions set out in last year's MTFS for 2018-19 have been specifically reviewed to allow members to agree a balanced budget and Council tax requirement for that year.

Whilst 2018-19 is the third year of the government's four year guaranteed funding settlement, the introduction of a London-wide business rates retention pilot scheme and the Councils decision to participate will have an impact on the resources the Council receives through Revenue Support Grant and Business Rates and this change for 2018-19 is considered in this report.

In addition, further demographic and inflationary budget pressures together with mayoral priority growth proposals have also been identified and the action that is needed to meet these additional commitments over the existing MTFS assumptions are presented in this report.

The impact on the Council's MTFS of the Chancellors Autumn Statement that was announced on the 22<sup>nd</sup> November 2017 and the 2018-19 provisional local government finance settlement which followed on the 19<sup>th</sup> December 2017 are also considered in this report. However, it should be noted that the final settlement is

expected to be announced shortly and therefore the figures and assumptions within the report could be subject to change and may need to be updated before being submitted for Full Council approval on the 21<sup>st</sup> February.

A summary of the projected General Fund budget for each of the three years 2018 - 2021 is shown in Appendix 1A with a more detailed service analysis in Appendix 1B.

The report also includes revised assessments of the Dedicated Schools Grant (DSG), Housing Revenue Account (HRA) and a 10 year Capital programme.

## **RECOMMENDATIONS**

The Mayor in Cabinet is recommended to :

1. Agree a General Fund Revenue Budget of £343.703m subject to any changes arising from the Final Local Government Finance Settlement.
2. Agree the Council Tax (Band D) at £986.14 for 2018-19 to be referred to Full Council for consideration.
3. To authorise the Corporate Director, Resources after consultation with the Mayor and Lead Member of Resources to make any changes required to the budget following the final settlement announcement in February.
4. Approve the revised Capital Programme for the period to 2027-28; as detailed in Appendix 9A-D and adopt the associated capital estimates.
5. Approve the draft 2018-19 Housing Revenue Account budget as set out in Appendix 8A
6. Approve the draft 2018-19 Management Fee payable to Tower Hamlets Homes (THH) of £30.979m as set out in Table 4.
7. Note that under the Management Agreement between the Council and THH, THH manages delegated income and expenditure budgets on behalf of the Council. In 2018-19, THH will manage delegated income budgets totaling £87.101m and delegated expenditure budgets of £25.829m.
8. Note the refreshed strategic priorities and outcomes (Paragraph 3.2.4) for the final year of the three year Strategic Plan agreed by Cabinet in April 2016.
9. Consider and comment on the following matters:

### **General Fund Revenue Budget for 2018-19 and Medium Term Financial Strategy 2018-19 to 2020-21**

The initial budget proposal and Council Tax for 2018-19 together with the Medium Term Financial Strategy set out in Appendix 1A.

Note the decision made by the Mayor in Cabinet to participate in the London Wide Business Rates Retention pilot scheme and also reflecting the Mayor's instruction that the case for greater local retention must be vigorously pursued.

Note the decision of the Mayor in Cabinet to increase the Council Tax empty homes premium from 50% to 100%. These changes will require primary legislation in parliament to amend section 11b of the Local Government Finance Act 1992 and will not be completed for the 2018-19 financial year.

## **Budget Consultation**

The outcome of consultation so far with business ratepayers, residents and other stakeholders is set out in Section 3.13 and Appendix 10.

## **Funding**

The funding available for 2018-19 and the indications and forecasts for future years as set out in Section 3.4.

## **Growth and Inflation**

The risks identified from potential growth and inflation commitments arising in 2018-19 and future years together with new initiatives identified as Mayoral Priority Growth as set out in Section 3.5 and Appendix 3.

## **Savings**

New proposed saving items to be delivered in 2018-19 and 2020-21 as set out in Section 3.6 and Appendix 4 of the report.

## **Financial Risks: Reserves and Contingencies**

The strategic budget risks and opportunities as set out in Section 3.7 and the assessment of risk as detailed in Appendix 6.

## **Reserves and Balances**

The proposed approach to the strategic use of reserves as set out in Section 3.8 and the projected movement in Reserves as detailed Appendix 7.

## **Schools Funding**

The position for schools' funding including the Dedicated Schools Grant as set out in Section 3.9.

## **Housing Revenue Account**

The position of the Housing Revenue Account as set out in Section 3.10 and Appendix 8A and B

## **Capital Programme**

The Capital Programme to 2027-28; including proposed revisions to the current programme as set out in Section 3.11 and detailed in Appendix 9A-D.

## **1 REASONS FOR THE DECISIONS**

- 1.1 The Council is under an obligation to set a balanced and sustainable budget and to set the Council Tax levels for the next financial year by 11th March 2018 at the latest. 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.
- 1.2 The announcements that have been made about Government funding for the Council in the Autumn Statement and the Provisional Local Government Finance Settlement require a robust and timely response to enable a balanced budget to be set.
- 1.3 The Council is in the third year of the 4 year 'guaranteed settlement' from the government. A Medium Term Financial Strategy (MTFS) covering the entirety of the resources available to the Council is considered to be the best way that resource prioritisation and allocation decisions can be considered and agreed in a way that provides a stable and considered approach to service delivery and takes into account relevant risks and uncertainty.
- 1.4 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.
- 1.5 The Mayor is required by the Local Government and Housing Act 1989 to determine a balanced Housing Revenue Account (HRA) budget prior to the start of the new financial year. The Council must also approve the Management Fee payable to Tower Hamlets Homes (THH) so that it can fulfil its obligations under the Management Agreement to manage the housing stock on behalf of the Council.
- 1.6 In accordance with Financial Regulations, capital schemes must be included within the Council's capital programme, and capital estimates adopted prior to any expenditure being incurred. This report seeks the adoption of the necessary capital estimates for various schemes in order that they can be progressed.

## **2 ALTERNATIVE OPTIONS**

- 1.1 The Council is required to respond to the budget reductions in Government funding of local authorities and 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, in the context of its understanding of need and inequality and to the extent permitted by its resources, those services it wishes to prioritise through investment, during a continued period of budget reductions.



- 1.2 The Council has a statutory duty to set a balanced HRA and provide THH with the resources to fulfil its obligations under the Management Agreement. Whilst there may be other ways of delivering a balanced HRA, the proposals contained in this report are considered the most effective, in realising all the council's statutory duties having regard to the matters set out in the report.

### **3 DETAILS OF REPORT**

#### **3.1 BACKGROUND**

- 3.1.1 In February 2017 the Council agreed a balanced budget for 2017-18 and a Medium Term Financial Plan (MTFP) to 2019-20 identifying savings of £52m to be delivered over the medium term period and a requirement to use £2.8m of general fund reserves. This was done in the context of some certainty over government grant funding levels afforded by signing up to the four year guaranteed funding settlement covering 2016-20.
- 3.1.2 Following this and as we enter into the third year of the 4 year funding deal, there have been a small number of changes including the chancellors autumn statement and provisional settlement announcement, the agreement by the government to the introduction of a London-wide business rates retention pilot, the addition of a further year to maintain a three year MTFS and revised assessments of growth, inflation and corresponding action that is required to maintain a balanced budget.
- 3.1.3 This report updates members on the impact of all of these changes, and identifies the additional proposals that will inform consideration of the budget package by the Overview and Scrutiny Committee.
- 3.1.4 The main body of the report is in eleven sections:
- Strategic Approach (Section 3.2)
  - Medium Term Financial Strategy & Proposed Budget (Section 3.3)
  - Financial Resources (Section 3.4)
  - Budget Pressures and Growth Allocations (Section 3.5)
  - Savings Proposals (Section 3.6)
  - Risks and Opportunities (Section 3.7)
  - Reserves (Section 3.8)
  - Schools' Funding (Section 3.9)
  - Housing Revenue Account (Section 3.10)
  - Capital (Section 3.11)
  - Treasury Management Strategy (Section 3.12)
- 3.1.5 The key planning assumptions that support the draft budget proposals are set out below and in the attached appendices.
- 3.1.6 In developing these proposals the Council has taken account of the government's measure of the total resources that it believes are available to each Council. This is known as Core Spending Power (CSP) and reflects the government's assumptions for a number of key grants, retained business rates and Council Tax.
- 3.1.7 The Council's CSP calculation is attached as Appendix 2; the most recent

calculation reflects the following changes:

- The impact of changing the New Homes Bonus methodology;
- The additional announcement of the improved better care fund to support increased pressures in social care; and
- Revised assumptions on the level of assumed Council Tax increases for inflationary purposes.

## **3.2 STRATEGIC APPROACH**

3.2.1 The Council continues to implement an Outcomes Based Budgeting approach to delivering its MTFS for the period 2018 to 2021. This approach puts the Council's Strategic Priorities and outcomes for its residents at the heart of financial planning and decision making and aims to directly link how resources are allocated through budgeting mapped to the strategic priorities of the Council.

3.2.2 An outcomes based approach considers the efficiency and effectiveness of the Council's services by evaluating comparable information such as financial benchmarking and outcome performance measures. This information provides the starting point for critically reviewing the Council's relative performance and provides the basis and evidence for its budget decisions.

### **Strategic Plan 2016-19**

3.2.3 In April 2016 Cabinet agreed a three year Strategic Plan focusing on improving outcomes for local people, shaping the borough and delivering sustainable improvements in the way the Council operates. The Plan is refreshed annually to ensure it is aligned with emerging priorities for the organisation and borough. As part of the annual review Cabinet agreed a refreshed plan and delivery plan in April 2017. The Council's strategic approach is to focus on improving outcomes which means the final year Strategic Plan will be developed along the Outcomes Based Accountability framework. This will strengthen the organisation's ability to assess the impact of resources on delivering outcomes. The Council will review the strategic activities and performance measures and ensure there is alignment with the emerging themes of the borough-wide Community Plan that is being developed by the Tower Hamlets Strategic Partnership. The Council's Strategic Plan accompanied by a Delivery Plan and refined Strategic Measures will be reported in March 2018 and ensure the organisation's business planning and performance management and accountability framework reflect the revised approach.

3.2.4 In line with this approach the revised strategic priorities and outcomes are set out below:

<b>Priority 1: People are aspirational, independent and have equal access to opportunities</b>	
Outcomes we want to achieve	Children and young people feel they are protected and get the best start in life and realise their potential
	People access a range of education, training, and employment opportunities and feel they share the benefits from growth
	People access joined-up services when they need them and feel healthier and independent
	Inequality is reduced and people live in a cohesive community

<b>Priority 2: A borough that our residents are proud of and love to live in</b>	
Outcomes we want to achieve	People live in a borough that is clean and green
	People live in good quality and affordable homes and neighbourhoods
	People live in safer neighbourhoods and anti-social behaviour is tackled

<b>Priority 3: A focussed and efficient Council co-producing excellent services</b>	
Outcomes we want to achieve	The Council is open and transparent putting residents at the heart everything we do
	The Council works collaboratively across boundaries in strong and effective partnerships to achieve the best outcomes for our residents
	The Council continuously seek innovation and strives for excellence to embed a culture of sustainable improvement

3.2.5 An analysis of the Council's net expenditure in 2017-18 against each of these strategic priority areas is presented in Table 1 below. However, in developing its budget proposals the Council has recognised that it is equally important to consider both the gross expenditure and income components of the budget when reviewing outcomes and performance.

**Table 1 – Net Expenditure 2017-18 – Priority Analysis**

Priority Area	2017-18 Budget £m
Children and young people feel they are protected and get the best start in life and realise their potential	68.965
People access a range of education, training, and employment opportunities and feel they share the benefits from growth	3.440
People access joined-up services when they need them and feel healthier and independent	144.250
Inequality is reduced and people live in a cohesive community	12.827
People live in a borough that is clean and green	40.099
People live in good quality and affordable homes and neighbourhoods	5.305
People live in safer neighbourhoods and anti-social behaviour is tackled	6.213
A focussed and efficient Council co-producing excellent services	40.044
No Strong alignment	24.769
<b>Net General Fund Budget</b>	<b>345.913</b>

3.2.6 The Council's approach to delivering services going forward are underpinned by the following transformation principles;

- Achieve the best outcomes for our residents by integrating services across the council and partners to make the most of the money we have.
- Become a modern council with new ways of working and an agile workforce that is supported by the necessary infrastructure now and at our new home in Whitechapel
- Use technology and information to provide better services and empower our citizens so they take a more active role in their area, co-design services and become less reliant on the council
- Reduce future demand on the council through measures including better forecasting of need, supporting independent living and providing early intervention to prevent problems escalating in later life
- Harness economic growth that benefits our residents by making it simple for businesses to set up and invest in our borough

3.2.7 The Council's approach to strategic and financial planning has been informed by an understanding of the equality needs, opportunities and potential in the borough. This includes:

- Ongoing economic growth and a rising employment rate;

- A vibrant population with a high proportion of young people;
- An active voluntary and community sector; and
- A partnership committed to collaborative working around priority outcomes.

3.2.8 It also recognises that there are significant inequalities and longer term challenges as identified in the borough equality assessment which include:

- Lower employment levels, particularly for women and some ethnic minorities;
- Significant child poverty and the impact of welfare benefit reductions;
- Local people priced out by spiralling housing prices, and the danger of a polarised community;
- Low levels of health and life expectancy; and
- The need to be vigilant and tackle the potential for radicalisation and extremism.

### **3.3 MEDIUM TERM FINANCIAL STRATEGY & PROPOSED BUDGET**

3.3.1 The revised Medium Term Financial Strategy is set out at Appendix 1A, and the detail by service area at Appendix 1B. The detailed figures and assumptions incorporated in these tables are explained more fully in this report. The figures assume a council budget requirement of £343.703m for 2018-19; a Council Tax at Band D of £986.14 and a requirement of £5.763m from reserves over the MTFS period to 2020-21.

#### **Autumn Budget (Chancellors Statement) – November 2017**

3.3.2 The Chancellor's autumn statement in November included a number key announcement's that effect local government.

3.3.3 There were a number of changes to business rates which include:

- The indexation rate used to set the national non domestic rate multiplier will be based on the Consumer Price Index (CPI) rather than the Retail Price Index (RPI) from April 2018. With CPI being generally lower than RPI, the impact is a potential loss in revenue.
- The £1k discount to business rates bills for pubs with a rateable value of less than £100k will be extended for another year.

3.3.4 Both of these changes will reduce the level of business rates income and the government has said that local authorities will be compensated through additional grant. Therefore the impact will be neutral for local authorities in 2018-19 and 2019-20. However, if this is not compensated for at the time of any business rate re-basing exercise the Council's business rate baseline will be lower; resulting in an on-going loss of resources. In the provisional local government finance settlement the government confirmed a reset of business rates will take place in 2020-21

3.3.5 The government also confirmed that a London-wide business rates retention pilot will go ahead for 2018-19. The Council in October agreed in principle to participate in that Pool and this report sets out the formal decisions necessary to put in place that arrangement.

- 3.3.6 The plans announced in the Autumn Statement allow Council's to charge 100% extra Council tax on properties that have been empty for 2 or more years. This is currently set at 50%.
- 3.3.7 This change has been introduced to incentivise the reuse of empty properties which could not only help with the housing crisis but also increase funding through the New Homes Bonus scheme by reducing the number of long term empty properties.
- 3.3.8 In the current year the Council has 73 long term empty properties subject to the current provisions generating approximately £40k of levy charge. If the levy were to be increased from 50% to 100% this would therefore generate an additional £40k providing the numbers remained consistent.
- 3.3.9 The Government also announced a number of changes to boost Housing Growth including plans to increase the numbers of new homes being built to 300,000 per annum by the middle of the 2020s through a range of initiatives:
- The government will provide £1.1bn for a new Land Assembly Fund; a further £2.7bn to the competitively allocated Housing Infrastructure Fund (HIF) in England and a further £630m through the NPIF to accelerate the building of homes on small, stalled sites, by funding on-site infrastructure and land remediation.
  - Housing Revenue Account borrowing caps for councils in areas of high affordability pressure can be lifted so they can build more council homes. Local authorities will be invited to bid for increases in their caps from 2019-20, up to a total of £1bn by the end of 2021-22.
  - The Department for Communities and Local Government (DCLG) is to launch a consultation with detailed proposals on reforms to the CIL.
- 3.3.10 A number of changes to Welfare reform were also announced:
- A package of measures to support the continued roll out of Universal Credit (UC) including removal of the 7-day waiting period for UC claimants and new assistance to support people during the 6-weeks before the first payment.
  - A Targeted Affordability Fund that will increase Local Housing Allowance (LHA) rates for certain properties in areas of high private rented sector rents.
  - A national living wage of £7.83 from April 2018

## **3.4 FINANCIAL RESOURCES**

### **Council Tax**

- 3.4.1 At its meeting on 9th January 2018, the Mayor in Cabinet agreed the council's 2018-19 taxbase at 95,095 Band D equivalent properties and this has been used in the MTFS projections.
- 3.4.2 Council Tax income is a key source of funding for Council Services. The amount generated through Council Tax is principally determined by the Council Tax Base (the number of properties adjusted for exemptions and discounts) and the rate of charge per property.

- 3.4.3 The borough has seen year on year increase in the number of new homes over the last few years and this continues to be a key priority area for growth for both central government and the Council. Previous trends coupled with current projections for growth means that the Council Tax Base is expected to be higher in 2018-19 than previously forecast.
- 3.4.4 The Council can, subject to legislative constraints, increase its Council tax rate through two mechanisms; the Adult Social Care precept and through a general inflationary increase. Each 1% increase in the Council Tax rate generates around £919k per annum, which equates to approximately 19 pence per week. In the provisional settlement, the Chancellor announced that in line with inflation, the referendum limit has been increased from 2% in 2017-18 to 3% in 2018-19.
- 3.4.5 In 2016-17 and for the remainder of the Spending Review period, the government introduced an Adult Social Care (ASC) precept to allow local authorities to raise additional council tax to help in addressing the growing adult social care funding crisis. In 2017-18 the precept was limited to a maximum of 3% in any one year and to a maximum of 6% over the three year period 2017 – 2020.
- 3.4.6 In February 2017, the Council agreed, in respect of the ASC precept, to implement increases of 3%, 2%, and 1% respectively for the years 2017-18 to 2019-20; there were no general inflationary increases proposed for 2018-19.
- 3.4.7 Based on the current position there are no proposals to change the assumptions agreed in February 2017 and as a result Council Tax rates will only increase in 2018-19 by the 2% ASC Precept previously agreed, which equates to an increase of 37 pence per week.
- 3.4.8 Currently Tower Hamlets has one of the lowest Council Tax levels across the 33 London Boroughs It is likely that even after implementing the proposed increase for the ASC precept this year, the Council would continue to have one of the lowest Council Tax rates in London.

#### **Local Council Tax Reduction Scheme**

- 3.4.9 In April 2013 the Government replaced the national Council Tax Benefit scheme, which was supported through a grant, with a requirement for each Local Authority to develop its own Local Council Tax Reduction Scheme (LCTRS). At the same time, the Government reduced its funding contribution to Local Authorities nationally by 10% and put in place mandatory protections for some groups of recipients such as pensioners.
- 3.4.10 The Mayor in Cabinet considered and agreed a report on the 9th January 2018 which proposed no changes to the 2017-18 Local Council Tax Reduction Scheme (LCTRS).

#### **Settlement Funding Assessment (SFA)**

- 3.4.11 Settlement Funding Assessment (SFA) reflects the government's current approach to funding most local authorities through Revenue Support Grant (RSG) and retained business rates. However, the proposed London-wide Business Rates Retention pilot will alter the way that the Council receives its resources and in particular will lead to the replacement of RSG by retained business rates.

- 3.4.12 The approach for the London pilot scheme is considered further below although as one of the underpinning principles of the pilot scheme is that no authority will be worse off under the proposed pilot scheme than under the existing arrangements, the method for determining the amount of Revenue Support Grant is set out below for information.
- 3.4.13 Each authority's SFA is based on a needs assessment established at the beginning of the funding arrangements and thereafter reflecting the impact primarily of government funding reductions. The Baseline Funding Level represents the amount of retained business rates that the government expects each local authority to generate assuming no increase in the tax base since the scheme inception (i.e. it continues to increase only in line with the increase in the relevant business rate multiplier).
- 3.4.14 The difference between SFA and the Baseline Funding Level is the amount of RSG an authority receives. For Tower Hamlets this calculation is shown below.

**Table 2 – Settlement Funding Assessment 2017 - 2020**

£m	2017-18	2018-19	2019-20
<b>Settlement Funding Assessment</b>	<b>158.105</b>	<b>151.071</b>	<b>142.935</b>
Revenue Support Grant	53.958	43.795	33.281
Baseline Funding Level	104.147	107.276	109.655
<i>Change in SFA:</i>			
<i>Annual change</i>		-4.4%	-5.4%
<i>Cumulative change</i>		-4.4%	-9.6%

#### **Revenue Support Grant (RSG)**

- 3.4.15 As previously reported the Council was accepted for the government's guaranteed multi-year settlement for RSG. However, participating in the London Business Rates Pooling Pilot means that the Council will be retaining additional business rates equivalent to the value of RSG in 2018-19 rather than receiving grant payments from the Department for Communities and Local Government (DCLG).
- 3.4.16 At the time of the Provisional Settlement the government confirmed its intention to review the methodology for distribution resources on a needs-led basis; this will be achieved through their Fair Funding review for which consultation will commence from late 2018 in time for implementation in the 2020-21 settlement.

#### **Retained Business Rates (London-wide Pilot pooling 2018-19)**

- 3.4.17 The Government formally confirmed its commitment to establishing a 100% business rate retention pilot in London from April 2018 in the Autumn Budget. This was agreed by a memorandum of understanding (MOU) signed by the Chair of London Councils, the Mayor of London, the Minister for London and the Secretary of State for Communities and Local Government.



- 3.4.18 In October 2017, Cabinet agreed in principle that the Council would participate in pooling arrangements across London and the Mayor in Cabinet agreed on the 9th January to formally confirm its participation in the scheme.
- 3.4.19 It is estimated that the Council could receive an additional £8m through the pooling arrangements in 2018-19 and plans to use this for specific strategic priorities have been incorporated into the MTFS as detailed in section 3.5.9 and Appendix 3B.
- 3.4.20 The key principles of the pooling arrangement are summarised below;
- From the 1st April 2018 London Authorities will retain 100% of the Business Rates Income. London will not retain 100% of total rates collected, as it will continue to pay an aggregate tariff to government. The overall level of collected rates that will be retained is around 64% after the tariff is paid.
  - London authorities will also receive section 31 grants in respect of Government changes to the business rates system which reduce the level of business rates income. Section 31 grant will amount to 100% of the value of the lost income. Tariffs and top-ups will be adjusted to ensure cost neutrality.
  - The London pool will retain 100% of any growth in business rate income above baselines, and will pay no levy on that growth; it is from receiving a share of this growth (last estimated at £240m) that the Council estimates to receive an additional amount of around £8m.
  - Revenue Support Grant (RSG) will no longer be paid to the London authorities in 2018-19. Funding baselines will be increased by the equivalent amount to reflect this transfer of RSG; which will be £43.8m for Tower Hamlets as set out in the above section on the SFA.
  - London authorities will not be subject to more onerous rules or constraints under the 100% rates retention pilot, than they would have been if they had remained subject to the existing “67% scheme” in place in 2017-18.
  - No “new burdens” will be transferred to London and participation in the pilot will not affect the development or implementation of the Fair Funding Review.
  - In the event that London’s business rates income fell, the pool will have a higher “safety net” threshold – 97% rather than 92.5% of the overall baseline funding level – than in the existing system, reflecting the greater reliance local authorities will have on business rates within the pilot.
  - The Government will undertake a qualitative evaluation of the progress of the pilot based on the current research programme for the existing business rate retention pilots, with additional focus on the governance mechanism and decision making process, and the scale of resources dedicated to strategic investment.
  - The MOU between London Government and the Government only commits to the pilot operating for one year. However, subject to the evaluation of the pilot, it also commits the Government to working with London authorities to explore: future options for grants including, but not limited to, Public Health Grant and the Improved Better Care Fund;

the potential for transferring properties on the central list in London to the local list where appropriate; and legislative changes needed to develop a Joint Committee model for future governance of a London pool.

### Core Grants

- 3.4.21 In addition to Revenue Support Grant (RSG), the Council receives a number of other grants to support specific service priorities. These are summarised in the table below and further details on how they have been treated in the MTFS are provided in the sections that follow.

**Table 3 – Summary Core Grants 2018-21**

Core Grants	2018-19 £m	2019-20 £m	2020-21 £m
New Home Bonus	20.749	19.914	16.521
Improved Better Care Fund	11.907	14.851	12.777
Public Health Grant	35.049	34.319	34.319
Strategic School Improvement	0.200	0.200	0.200
Local Lead Flood Grant	0.034	0.036	0.000
<b>Total</b>	<b>67.939</b>	<b>69.320</b>	<b>63.817</b>

### New Homes Bonus

- 3.4.22 The New Homes Bonus (NHB) scheme was introduced in 2011-12 as a means to help tackle the national housing shortage. The scheme was designed to reward those authorities who increased their housing stock either through new build or by bringing empty properties back into use.
- 3.4.23 Tower Hamlets is a high growth area, and has attracted the highest level of NHB in the country. In the most recent provisional settlement the Government confirmed that the NHB payments to councils will be reduced from five years to four years in 2018-19.
- 3.4.24 The Council had already started to reduce its reliance on NHB as a funding source in support of its revenue budget from 2016-17 instead choosing to provide for increasing capital investment on affordable housing and infrastructure in line with its strategic priority of better quality homes for all. It has only assumed using £3.9m in 2018-19 – below the level of the revised 2018-19 NHB provisional settlement.

### The Improved Better Care Fund

- 3.4.25 The Better Care fund (BCF) was announced as part of the 2013-14 spending review. The Fund is a pooled budget, bringing together local council and NHS funding to create a national pot designed to integrate care and health services.
- 3.4.26 In addition to this, an Improved Better Care Fund (IBCF) was announced in the 2016-17 budget to support local authorities deal with the growing health and social care pressures during the period 2017-20. This funding takes into

account local authorities' ability to raise resources locally through the Adult Social Care precept.

### **Public Health Grant**

- 3.4.27 The Public Health Grant allocation for Tower Hamlets in 2018-19 has now been confirmed as £35.049m which represents a decrease of 0.925m from the 2017-18 grant allocation; this reduction has also been accommodated within the relevant budget provision
- 3.4.28 The government has previously indicated its intention to move the funding for the Public Health Grant from the current system to being funded from within the proposed 100% retained business rates scheme; although it was initially considered that this grant would form part of the London-wide business rate pilot scheme it has not been included in the final prospectus.
- 3.4.29 The provision for free school meals to all primary aged children over and above the current government policy of funding for Key Stage 1 pupils will continue to be partly supported from the public health grant. The total cost to the Council is estimated to be approximately £3.300m per annum and £1.000m has been included in the MTFS to be funded from the Public Health grant with the balance to be funded from a specific general fund reserve in line with the Councils strategic priorities around getting it right for our young people.

### **Strategic School Improvement Fund**

- 3.4.30 In November 2016, the government announced a £50 million fund for local authorities to “continue to monitor and commission school improvement for low-performing maintained schools”. This will be allocated to local authorities on the basis of the number of maintained schools, an area cost adjustment and top-up to ensure each local authority receives a minimum. The Council has successfully secured £0.200m for 2017-18 and assumes the same level of funding in the MTFS for 2018-19 onwards.
- 3.4.31 However, this replaces the former Education Services Grant which previously secured the authority £3.8m in 2016-17 and £2.7m in 2017-18. This change represents a further reduction in government grant funding.

## **3.5 BUDGET PRESSURES, GROWTH AND INFLATION**

### **Budget pressures**

- 3.5.1 A key part of the annual budget setting process is the review of budget demands across the medium term financial planning period arising from demographic changes, new requirements or responsibilities or inflationary pressures.
- 3.5.2 In February 2017, Council approved unavoidable growth of £6.944m over the period 2018 - 2020, £2.444m for 2018-19 and an additional £4.500m for 2019-20. Following a review as part of updating the MTFS for the period 2018 - 2021, additional growth arising from demographic changes, new requirements or responsibilities has been identified. These items are set out in Appendix 3A.

## **Inflation**

- 3.5.3 In addition to the budget pressures identified above a further financial risk facing the Council is the impact of inflation.
- 3.5.4 The Government's target projection for inflation which is reflected in the MTFS is 2.9% (CPI) throughout the review period. Most of the Council's contracts for goods and services which span more than one year contain inflation clauses and although service directorates have been successful in negotiating annual increases which are below inflation this will be a difficult position to maintain.
- 3.5.5 The Council remains part of the National Joint Council for Local Government Services for negotiating pay award arrangements. The MTFS anticipates that staffing costs will increase by 2% in each year of the three year plan. Provision has also been made for the payment of the London Living Wage to Council staff.
- 3.5.6 The estimated impact of inflation is also set out in Appendix 3A.

## **Mayoral Priorities**

- 3.5.7 The Mayor has also identified a number of key priority areas, consistent with the Council's Strategic Plan objectives, where it is proposed to target resources in order to improve specific outcomes for residents and businesses.
- 3.5.8 This includes a range of initiatives to maximise residents' access to jobs and training, supporting people in overcoming barriers to employment, including specific measures for enabling parents to move into childcare roles. The proposals also allow for the continuation of measures, adopted in 2017-18, to extend the provision of free school meals to all primary age pupils and initiatives designed to assist with the impact of welfare reform through the tackling poverty fund.
- 3.5.9 These investment proposals are detailed in Appendix 3B and will be funded principally from the additionally retained business rates income that the authority expects to receive through participating in the London-wide business rates pilot.
- 3.5.10 In addition to this, on the 19th September 2017 Cabinet agreed to invest £1m per year for three years on additional policing across the borough. This has been incorporated into the Council's MTFS and will also be funded through reserves. Further details on the scheme can be found within the 19th September cabinet report.

## **3.6 SAVINGS PROPOSALS**

- 3.6.1 The Council continues to implement an Outcomes Based Budgeting approach to delivering its MTFS for the period 2018 to 2021. This supports the council's approach to reducing inequality by focussing on the differences in outcomes for different equality groups. In 2017-18 the Council approved appropriate savings covering the whole of the period of the MTFS which ensured that a balanced budget for 2018-19 and 2019-20 was already in place. Detailed consultation and equality impact assessments will continue to be undertaken as the proposals agreed previously are taken through to implementation.

- 3.6.2 Whilst there have been a number of changes necessary to the 2018-19 budget, largely as a result of needing to revisit assumptions around demographic growth and inflation, the Council will be able to meet the estimated gap through the additional Treasury Management savings and additional parks income identified.
- 3.6.3 For 2020-21 a number of high level saving areas have also been identified that will be developed over the next 9 – 12 months; the detail of which will be brought back for approval by the Cabinet and Council in due course. The high level summary of the proposed saving areas are detailed in Appendix 4. The proposals have been subject to an equalities analysis screening exercise to review the impacts identified to date and to determine the next steps for further equality analysis that will be undertaken as part of the decision making process governing these proposals.

### **3.7 RISKS AND OPPORTUNITIES**

- 3.7.1 When setting the draft MTFS, Service Directors have provided their best estimate of their service costs and income based on the information currently available. However there will always be factors outside of the Council's direct control which have the potential to vary the key planning assumptions that underpin those estimates.
- 3.7.2 There are a number of significant risks that could affect either the level of service demand (and therefore service delivery costs) or its main sources of funding. In addition there are general economic factors, such as the level of inflation and interest rates that can impact on the net cost of services.
- 3.7.3 Similarly there are opportunities either to reduce costs or increase income which will not, as yet, have been fully factored into the planning assumptions.

The main risks and opportunities are summarised below.

#### **Risks**

##### **Regulatory Risk**

- Business Rates – Impact of abolition of the 'staircase tax'

##### **General Economic Factors**

- Impact of decision to leave European Union
- Economic growth slows down or disappears
- A general reduction in debt recovery levels
- Further reductions in Third Party Funding
- Further reductions in grant income
- Reductions in the level of income generated through fees and charges
- Increase in fraud

##### **Increases in Service Demand**

- Children's Social Care including an increase in the number of looked after children, unaccompanied asylum seekers or those with no recourse to public funds
- Housing (and homelessness in particular)
- General demographic trends (including impact of an ageing population)
- Impact of changes to Welfare Benefits

### **Efficiencies and Savings Programme**

- Slippage in the expected delivery of the savings programme
- Non-delivery of some savings proposals

### **Opportunities**

- Growth in local taxbase for both housing and businesses
- Service transformation and redesign including digital services
- Invest to save approach to reduce revenue costs
- Income generation opportunities including commercial approaches.

3.7.4 In addition to the above there is a risk that the combined impact of some of these factors will adversely impact on service standards and performance.

3.7.5 An assessment of the possible impact of these risks and opportunities is shown in the risk analysis in Appendix 6. This will form the basis of an on-going review of Reserves and Contingencies. This illustrates that there are a range of risk outcomes at medium and high level ranging from £22m to £42m. The Chief Financial Officer has concluded that, based on the level of contingencies, earmarked and general reserves, that there is sufficient cover to accommodate this level of risk.

## **3.8 RESERVES**

3.8.1 Reserves are an important part of the Council's financial strategy and are held to create long-term budgetary stability. They enable the Council to manage change without undue impact on the Council Tax and are a key element of its financial standing and resilience.

3.8.2 The Council's key sources of funding face an uncertain future and the Council therefore holds earmarked reserves and a working balance in order to mitigate future financial risks.

3.8.3 There are two main types of reserves:

- Earmarked Reserves – which are held for identified purposes and are used to maintain a resource in order to provide for expenditure in a future year(s); and
- General Reserves – these are held for 'unforeseen' events

3.8.4 The Council maintains reserves both for its General Fund activities and in respect of its Housing Revenue Account (HRA). In addition it accounts for the reserves of schools.

3.8.5 The amount of reserves held is a matter of judgment which takes into account the reasons why reserves are maintained, and the Council's potential financial exposure to risks. A Reserves Policy is included as Appendix 5.

3.8.6 The Council holds reserves in order to mitigate future risks, such as increased demand and costs; to help absorb the costs of future liabilities; and to enable the Council to resource policy developments and initiatives without a disruptive impact on Council Tax. Capital reserves play a similar role in funding the Council's capital investment strategy.

3.8.7 The Council also relies on interest earned through holding reserves to support

its general spending plans.

- 3.8.8 Reserves are one-off money. The Council aims to avoid using reserves to meet on-going financial commitments other than as part of a sustainable budget plan. The Council has to balance the opportunity cost of holding reserves in terms of Council Tax against the importance of interest earning and long term future planning.
- 3.8.9 Reserves are therefore held for the following purposes, some of which may overlap:
- Providing a working balance i.e. Housing Revenue Account and General Fund.
  - Smoothing the impact of uneven expenditure profiles between years e.g. local elections, structural building maintenance and carrying forward expenditure between years.
  - Holding funds for future spending plans e.g. Capital Expenditure plans, and for the renewal of operational assets e.g. Information Technology renewal.
  - Meeting future costs and liabilities where an accounting 'provision' cannot be justified.
  - Meeting future costs and liabilities so as to cushion the effect on services e.g. the Insurance Reserve for self-funded liabilities arising from insurance claims.
  - To provide resilience against future risks.
  - To create policy capacity in a context of forecast declining future external resources.
- 3.8.10 All earmarked reserves are held for a specific purpose. A summary on the movement on each reserve is published annually, to accompany the annual Statement of Accounts.
- 3.8.11 The use of some reserves is limited by regulation e.g. reserves established through the Housing Revenue Account can only be applied within that account and the Car Parking reserve can only be used to fund specific transport related expenditure. Schools reserves are also ring-fenced for their use.

### **3.9 SCHOOLS' FUNDING**

- 3.9.1 The largest single grant received by the Council is the Dedicated Schools Grant (DSG), which is ring-fenced to fund school budgets and services that directly support the education of pupils.
- 3.9.2 There are a number of pressures, specifically in relation to the High Needs Block which is managed by the Council for those pupils with needs that cannot be fully met from schools' individual budgets. The Government has extended the scope of the High Needs funding to cover educational costs of children and young people up to the age of 25. This expansion of the age range, coupled by an increase in the number of children who are applying for Education, Health and Care plans is placing significant pressure on both the retained budget and schools' own budgets.
- 3.9.3 In January 2017 the Department for Education (DfE) issued a consultation

document outlining proposals for a new national funding formula (NFF) for schools to be implemented in 2018-19. Following that consultation the government issued a policy document on a national funding formula for schools and high needs on 14 September 2017. The government also issued operational guidance for schools revenue funding in 2018-19.

- 3.9.4 Local Authorities are required use the operational guidance in the setting of local formulae for 2018-19. The proposals include a 2 year period in which a “soft” formula will be operated. Under the soft formula local authorities will receive funding on the basis of the NFF but will continue to use their own locally agreed formula.
- 3.9.5 It is intended that from April 2020 a “hard” formula will be implemented under which schools will receive their funding directly from the Education and Skills Funding Agency (ESFA) according to a single national formula.
- 3.9.6 From April 2018, the Dedicated Schools Grant will be allocated in four blocks (schools, high needs, early years and central schools services). Each will be calculated on the basis of a different formula. Within the Schools and High Need Blocks, the Government will provide for at least a 0.5% per pupil increase in 2018-19 and 2019-20 through the national funding formula. Schools can also, through the Schools Forum, agree to de-delegate some of their Schools Block resources for certain specific services such as to fund release time for trade union duties and allow the Local Authority to fund them centrally on behalf of all schools.
- 3.9.7 A new Central Schools Services Block (CSSB) is being introduced in 2018-19 to fund LAs for their statutory duties relating to maintained schools and academies. The CSSB brings together funding previously allocated through the retained duties element of the Education Services Grant; funding for ongoing central functions e.g. admissions; and funding for historic commitments e.g. items previously agreed locally such as combined budgets.
- 3.9.8 The table below sets out the estimated DSG deployment over the funding blocks for 2018-19;

<b>Schools Forum Summary</b>		<b>2018-19 £000</b>
1.0 Schools Block		271,305
1.1 De-delegated items (Schools Block)		864
1.2 High Needs Block		44,386
1.3 Early Years Block		28,280
1.4 Central Schools Service Block		4,851
Total Schools Budget	<b>Expenditure 2017-18</b>	<b>349,686</b>
<b>Schools Forum Summary</b>		<b>2018-19 £000</b>
1.7.1 DSG		-285,502
1.7.2 DSG B/F		
1.7.3 EFA Grants Post 16		-12,896
1.7.5 Academy Recoupment		-51,288
Total funding	<b>Income 2017-18</b>	<b>-349,686</b>



- 3.9.9 In addition the Council receives, and passports fully to schools, funding for the pupil premium (£23.3m) and 6th form funding (£12.9m). Final allocations for the pupil premium are confirmed in July 2018 and 6th form funding in March 2018.
- 3.9.10 Schools Forum will be asked to agree the total schools budget of £349.7m for 2018-19 at their January 2018 meeting, £336.8m of which will be funded through the Dedicated Schools Grant from the DfE with the remainder being funded through EFA grants.

### **3.10 HOUSING REVENUE ACCOUNT (HRA)**

- 3.10.1 The HRA relates to the activities of the Council as landlord of its dwelling stock, and the items to be credited to the HRA are prescribed by statute. Income is primarily derived from tenants' rents and service charges, and expenditure includes repairs and maintenance and the provision of services to manage the Council's housing stock.
- 3.10.2 Since 1990 the HRA has been "ring-fenced"; this was introduced as part IV of the Local Government & Housing Act 1989 and was designed to ensure that rents paid by local authority tenants reflect the associated cost of services. This means that the HRA cannot subsidise nor be subsidised by Council Tax i.e. any deficits or surpluses that arise cannot be met from or transferred to the General Fund. In addition, the HRA must remain in balance.
- 3.10.3 In April 2012, HRA Self-Financing was introduced to replace the national HRA subsidy system. Under Self-Financing, local authorities retain all income but are responsible for all expenditure relating to their housing stock; with local authorities able to make decisions about their stock and engage in long-term planning. Recent policies introduced or announced by the government have substantially reduced the discretion that local authorities are able to exercise, for example in relation to rent setting, tenancy types and asset management.

#### **DRAFT BUDGET 2018-19**

##### **Rent Reduction**

- 3.10.4 On 9th January 2018, the Mayor in Cabinet noted that the 1% annual rent reduction introduced by the government which came into effect in 2016-17 continues for four years until 2019-20. This equates to approximately £0.650m in reduced rental income. The effect of this reduction has been incorporated into the 2018-19 budgets in Appendix 8A.

##### **Tenant Service Charges**

- 3.10.5 On 9th January 2018, the Mayor in Cabinet agreed an increase in tenant service charges of 4% per week from April 2018. This equates to an average of £0.31 per week. This is reflected in the 2018-19 budget in Appendix 8A.

##### **Repairs and Maintenance**

- 3.10.6 The Repairs and Maintenance budget for 2018-19 has been increased by £0.301m, to reflect contractual uplifts. A contingency of £0.5m has been incorporated into the budget. This will only be made available once a satisfactory business case for its use has been considered and agreed by the

Council.

### Savings

3.10.7 At its meeting on July 26th 2016, the Mayor in Cabinet agreed a HRA medium- term savings target of £6m. In 2018-19 savings of £746,000 have been made within the Tower Hamlets Homes (THH) management fee (see Table 4 below), and a £426,000 reduction across the delegated budgets. However, as well as these savings there are also elements of growth requested within the 2018-19 management fee – these are outlined in the following section.

### Management Fee

3.10.8 In February 2017, The Mayor in Cabinet approved the 2017-18 Management Fee payable to THH for services provided to the Council. At £31.946m, the Management Fee represents the largest single expenditure element of the HRA budget. In July 2017, an additional £0.350m was approved to finance ongoing fire safety works, in addition to a 'one-off' allocation of £0.075m. The total revised 2017-18 Management Fee is therefore £32.371m.

3.10.9 The table below shows the calculation of the proposed 2018-19 Management Fee payable to THH. For 2018-19 and future years the treatment of capitalised fees and salaries has been amended so that they will be charged directly to the capital programme rather than included within the THH Management Fee. The effects of this are incorporated in the table below, and in the proposed Management Fee of £30.979m

**Table 4 – Calculation of 2018-19 Management Fee**

Description	Total £m
2017-18 Base Management Fee	31.946
Mayoral Decision July 2017 – Additional Fire Safety Works	0.350
2017-18 Revised Base Management Fee	32.296
Mayoral Decision July 2017 – Fire Safety Funding ('One-Off')	0.075
<b>Management Fee 2017-18</b>	<b>32.371</b>
2018-19 Base Management Fee	32.296
Base Budget Growth - Fire and Other Safety	0.599
Base Budget Growth - Other	0.944
Base Budget Savings	-0.746
Removal of Capital Fees	-2.668
Revised Base Management Fee 2018-19	30.425
'One-Off' Growth - Fire and Other Safety	0.050
'One-Off' Growth - Other	0.504
<b>Management Fee 2018-19</b>	<b>30.979</b>

3.10.10 At this stage, the proposed management fee does not include an inflationary increase in relation to a pay award. Salary costs represent approximately £20.0m of the management fee, resulting in an increase in employee costs of approximately £400,000 if a pay award of 2% is agreed. These costs are built into the HRA MTFP but will only be released to THH once the pay award is formally agreed.

### **Savings**

3.10.11 Tower Hamlets Homes has achieved savings of £746,000 from its base budget, mainly resulting from its relocation from Jack Dash House which takes effect in April 2018.

### **Base Budget Growth**

3.10.12 The proposed 2018-19 base budget incorporates £599,000 of growth in respect of fire and other safety measures, particularly relating to the expansion of THH's safety compliance teams.

3.10.13 Other growth of £744,000 is proposed to the base budget. This includes the effect of increases in the cost of services provided to THH by the Council under Service Level Agreements (SLAs) - £191,000 of the increase relates to base budget increases in the SLAs for Procurement and ICT; the continuation of a previously trialled graduate trainee programme to facilitate succession planning (£152,000); and strengthening the leasehold enforcement service to ensure that lease terms are complied with (£185,000). In addition to the SLA increase, on-going THH procurement costs are estimated at an additional £350,000 with additional 'one-off costs' included separately.

3.10.14 Growth of £66,000 has also been included to finance the appointment of a commercial manager to contract manage the repairs contracts. This is a 'spend to save' activity which it is anticipated will lead to savings on the repairs and maintenance budgets. The R&M budget therefore incorporates a reduction of £132,000.

### **One-off Growth Items**

3.10.15 The 2018-19 management fee incorporates other one-off growth of £504,000. This reflects THH procurement costs of £213,000 and increased council procurement support costs of £91,000 (via the SLA) that are necessary until the new repairs framework contracts are in place, including additional procurement support in relation to the management of fire safety contracts. In addition growth of £200,000 is required to ensure compliance with the new General Data Protection Regulations that come into force in May 2018, and to support the introduction of new HR management systems and processes.

### **MEDIUM TERM FINANCIAL PLAN**

3.10.16 Appendix 8A shows the HRA Medium Term Financial Plan (MTFP) for the period 2018-19 to 2022-23.

### **Overall position on the HRA**

3.10.17 The MTFP incorporates various income and expenditure assumptions and includes changes that will affect the budget, for example changes to stock numbers due to assumed Right to Buy sales and new supply resulting from agreed regeneration schemes.

- 3.10.18 The latest HRA MTFP is shown at Appendix 8A. The revised MTFP shows that, on current projections, the HRA reserve will reduce over the next few years, but will remain above the assumed minimum balance of £15m.
- 3.10.19 The level of bad debt provision is £600,000 in 2018-19 as the implementation dates for Universal Credit and direct payments have slipped, but the provision is forecast to rise to £700,000 in 2019-20. As the various reforms take effect, this assumption will be reviewed.

### **Capital Programme and Stock Needs**

- 3.10.20 The current stock condition survey provides an updated view of the needs of the Council's stock over the next 30 years.
- 3.10.21 On current projections the capital programme outlined is fully funded, although it is essential that before future capital estimates are formally adopted, schemes are assessed in light of their affordability within the HRA.

### **HRA Savings**

- 3.10.22 The 2018-19 budget reflects gross savings of £1.172m, of which £746,000 is within the management fee (see table above), and £426,000 of which is reflected in the delegated budgets. The MTFP at Appendix 8A reflects an additional £360,000 of savings over the rest of the MTFP period

### **RISKS**

#### **Sale of Higher Value vacant stock**

- 3.10.23 Under this policy local authorities will be required to make a payment to the government based on the market value of the authority's higher value housing stock that is likely to become vacant during that year. This money is to be used to extend the Right to Buy to housing association tenants.
- 3.10.24 As a result of the government's announcement that no levy will be payable on high value voids until April 2019 at the earliest, the HRA medium-term financial projections have been updated to move the introduction of a levy of £8.4m to 2019-20, continuing for a period of five years. The medium-term financial projections still assume that no asset sales will take place in response to the levy other than the current maximum of five disposals per year. It must be stressed that the sum of £8.4m is an estimate as the government has not provided any indication as to the size of the levy that will be payable. These assumptions will need to be re-visited once details are published by the government.

#### **Welfare Reform**

- 3.10.25 The main changes that will affect Council tenants are:
- 1) Benefit Cap
  - 2) Universal Credit and Direct Payments
- 3.10.26 The cumulative impact on the HRA will not be clear until the various reforms all take effect. Provision was made in the 2016-17 budget for an anticipated increase in the amount of bad debts, but due to the delay in implementing the changes this has not been necessary over the past few years. The budget continues to include a provision for bad debts of £600,000 in 2018-19, rising to £700,000 in 2019-20. This level of provision will be kept under review.

## **HOUSING REVENUE ACCOUNT CAPITAL ESTIMATES TO BE ADOPTED**

- 3.10.27 The Council's projected capital programme is included within this report and incorporates indicative funding for the Housing Revenue Account element of the capital programme over the five year period from 2018-19 to 2022-23. Separately, Appendix 8B provides details of the THH Housing Capital Programme.
- 3.10.28 Tower Hamlets Homes has prepared its five year indicative capital programme, showing the forecast required expenditure on the Council's existing stock (attached at Appendix 8B). The level of spend required over the next five years is anticipated to be in excess of £170m, however for the purposes of cashflow management a 30% over-programming factor has been assumed within the capital section of this report.
- 3.10.29 Appendix 8B shows an outline of the proposed THH capital programme over the next five years. The total THH projected capital programme in 2018-19 is £36.446m, and includes investment of £7.265m in fire safety works. Over the course of the five year capital programme, budgetary provision for fire safety works totals £26.8m.

### **Aids and Adaptations and Capitalisation of Voids - total £1.950m**

- 3.10.30 The programme also includes capital estimates for Aids and Adaptations (£500,000) and the capitalisation of the major costs involved in bringing void properties back into use (£1.450m). Works to void properties will include undertaking residual internal works e.g. replacing kitchens and bathrooms to properties where access was not gained during the Decent Homes programme.

### **Capitalisation of Fees and Salaries - £3.636m**

- 3.10.31 The programme includes project management fees associated with the delivery of the capital programme. Previously an element of these fees was included within the THH management fee, however in future these costs will be charged directly to the relevant capital project.

### **Contingency - £500,000**

- 3.10.32 The annual capital programme includes a £500,000 contingency budget, the use of which will be subject to the approval of the Corporate Director, Place.
- 3.10.33 Schemes within the HRA capital programme which involve works to existing properties will have an impact on leaseholders who are required to contribute towards capital works to external or communal areas.

### **Removal of Capital estimate for Right To Buy Buybacks**

- 3.10.34 The Council adopted a capital estimate of £27.3m on October 6th 2015 to finance the purchase of up to a maximum of 85 former social housing leasehold and/or freehold units of stock within the borough. The scheme was funded from retained capital receipts of £8.18m with the balance of £19.1m to be financed from HRA capital resources.
- 3.10.35 Although 49 properties have been repurchased, only two have been used for HRA purposes, with the rest being held within the General Fund for use as temporary accommodation. This report proposes in principle that the

remaining uncommitted budget of £26.2m currently within the HRA capital programme be ended, with acquisitions of property to be used for Temporary Accommodation continuing within the General Fund. This would enable HRA resources of £18.34m (representing the 70% Council contribution required to support the use of retained receipts towards funding of the scheme) to be used to finance other HRA initiatives; either capital works to the Council's existing dwelling stock or the development of new supply.

## **HOUSING GENERAL FUND CAPITAL ESTIMATES TO BE ADOPTED**

### **Local Affordable Housing Grant Programme**

- 3.10.36 The Mayor in Cabinet has previously agreed that funding of £7.06m be allocated for the creation of a Local Affordable Housing Grant Programme, targeted at Registered Providers (RPs.). This is fully funded from retained one for one right to buy receipts and represents a 30% contribution towards RP schemes and therefore contributes towards a total of £23.550m of replacement social housing.
- 3.10.37 This report seeks approval to extend this scheme by a further £5m again fully funded from retained one for one receipts. The extension of the scheme will also require the approval of the Grants Determination Sub-Committee.
- 3.10.38 Even if the Council plans to pass one for one receipts to a third party the responsibility to spend the required amount on replacement social housing remains with the Council. In the event that RPs within the borough fail to spend sufficient sums, or do not spend by the required deadlines, the Authority will be liable for any interest arising from a failure to spend in line with the Right to Buy agreement.

## **3.11 CAPITAL**

- 3.11.1 In February 2017 the council approved a capital strategy setting out the intention to ensure that capital expenditure was clearly focussed on its strategic objectives. It described adopting a longer term planning horizon and developing financing strategies and governance arrangements that would underpin this new approach.
- 3.11.2 Further work has taken place with Members during 2017-18 to identify those projects and areas for investment that reflect their ambition and priorities for capital investment and to establish a programme that is both realistic and affordable.
- 3.11.3 The broad approach to revised governance arrangements, which are designed to ensure the development and delivery of approved schemes and the financial implications of proposed investments, are set out below for approval. Detailed arrangements to support this process will be developed during 2018 and will include a streamlined gateway approval process for projects.
- 3.11.4 The previous capital programme, approved alongside the council's capital strategy spanned the period 2016 to 2022 and set out the estimated costs of existing approved schemes amounting to £411m. Further indicative schemes of £241m were also identified. In total this programme of £652m was fully financed from a range of sources including £126m of Prudential Borrowing.

- 3.11.5 The programme now proposed covers an extended planning period to 2028, amounts to some £574m and identifies the Council's investment in priority areas as a means of supporting the council's Community Plan together with its Transformation Programme (Smarter Together) which underpinned the approach to its three year Medium Term Financial Strategy for revenue expenditure. This represents the intended programme and adoption of it and the associated capital estimates allows the Council to proceed within this overall envelope. Performance will be closely monitored in the quarterly budget monitoring process and the arrangements being developed will enable schemes within the overall programme to be re-profiled where delivery can be accelerated.
- 3.11.6 For those schemes approved in previous years', revised budget provision covering the years 2017 to 2028 is set out in detail in Appendices 9A and 9B. The extent to which all capital schemes align with the Council's Strategic Priorities can also be seen in Appendix 9C.
- 3.11.7 Particular emphasis has been given to proposing realistic provisions in the earlier years recognising that capital cashflow is a significant contributor to optimising Treasury Management returns; this approach is closely aligned to the 2018-19 revenue budget proposal to achieve an additional £1.4m through a longer term investment approach. However, the financing strategy will also remain flexible enough to accommodate project acceleration if required.
- 3.11.8 Budget provision in 2017-18 that remains unspent will, subject to a detailed review and approval by the Mayor in Cabinet through the budget monitoring process, be carried forward and added to the 2018-19 programme. Current indications from the capital budget monitoring process is that this could add up to a further £30m to the 2018-19 programme.
- 3.11.9 A number of new schemes have also been identified based on the Council's priorities; these amount to almost £400m over the 10 year period to 2028 and are summarised against priorities in Appendix 9D; subject to their approval at Full Council in February they will be developed through the proposed governance arrangements.
- 3.11.10 To support the development of new schemes broad provisions have been included in the 2018-19 programme for feasibility study and business case development (£1.5m). Also, in order to allow for some of those schemes to progress to implementation and to allow scope for other works to be undertaken an unallocated provision of £15m (16%) has been included in the 2018-19 budget. The method for accessing these funds will form part of the new governance arrangements described below and will include all schemes including those that come from the Council's Infrastructure Development Plan evidence base.

#### **Programme Governance**

- 3.11.11 Projects including those of a capital nature are one of the key ways that the council delivers its strategic aims and priorities. The council is committed to ensuring that projects are delivered efficiently and that the best use is made of the resources available to the organisation.
- 3.11.12 Currently strategic programme governance is managed via the asset management and Capital Working Group and Board, with a number of related

and other boards that address thematic areas such as early years groups, S106 and CIL, housing investment, ICT, Highways and Civic Centre Project.

3.11.13 A revised approach will be developed to consider and ensure that the key functions set out below are undertaken effectively across all elements of the capital programme, taking into account the strengths from existing approaches. The key functions for which this corporate approach is required are:

- Developing a Capital Strategy;
- Identifying and developing schemes that deliver value for money and are consistent with the strategy and Members' priorities;
- Prioritising capital schemes taking into account outcomes and resources;
- Financing the overall programme;
- Managing and delivering approved programmes and projects;
- Monitoring and reporting progress; and
- Post implementation review.

3.11.14 There are also clear linkages across these various functions relating to the overall management of the Council's asset base including in particular asset management, asset acquisition and disposal. The current corporate approach to the centralisation of relevant functions will assist with ensuring that a single and consistent approach is developed across these key areas.

3.11.15 At this stage it is important to ensure that the role of officers and members is clear and supported by the Council's constitution, financial regulations such that governance can be exercised effectively. Further work on those arrangements will be undertaken during 2018 as the corporate restructures are developed and implemented.

3.11.16 All projects that require capital expenditure must be identified in departmental service plans. Approval of the Capital Programme and associated capital estimates is the responsibility of the Full Council who will receive proposals through a new senior officer level Capital Board, the Mayor's Advisory Board (MAB) will have the power to review individual projects, and the Mayor in Cabinet, who will consider the overall programme of project activity and its funding.

3.11.17 Project proposals are made in conjunction with the relevant Lead Member. The Mayor in Cabinet will periodically (Quarterly) receive programme update reports on capital schemes as part of the council's budget monitoring report and can 'call in' any project at any stage of the approval process when it is considered appropriate to do so. The Overview and Scrutiny Committee's review of the quarterly budget management report will afford a similar opportunity to scrutinise progress and performance of individual projects.

3.11.18 The Capital Delivery Team will deliver, project manage and own the progress of relevant projects from start to finish. This includes the provision of programme and individual project reports, financial monitoring against budgets, procurement risks and documentation.

3.11.19 The Mayor in Cabinet on the advice of the Capital Board will propose the budget to be set aside for capital for the forthcoming financial year. That sum



will be included in the Council's annual budget agreed by Full Council budget setting meeting in February/ March each year.

3.11.20 New projects may enter the Gateway Approval Process at any time during the year, but should be already planned in a department's service plan.

### **3.12 TREASURY MANAGEMENT STRATEGY**

3.12.1 The Treasury Management Strategy Statement will be revised and presented to Full Council in February 2018 in accordance with the CIPFA Treasury Management Code of Practice. The Statement will set out the proposed strategy with regard to borrowing, the investment of cash balances and the associated monitoring arrangements.

3.12.2 The proposed prudential indicators set out in the Treasury Management Strategy will be based on the capital programme above in Section 3.11 once finalised.

### **3.13 BUDGET CONSULTATION**

3.13.1 The Council launched its 2018-19 budget consultation with residents, local businesses and other stakeholders on 12<sup>th</sup> December 2017 and this is due to conclude on the 22<sup>nd</sup> January 2018.

3.13.2 The consultation, which sought residents' and businesses' views about the priorities the council should focus on as it plans for future service delivery, was carried out through the publication of a range of questions on the Council's website. Participation and stakeholder engagement was then promoted through e-newsletters distributed to over 19,000 residents, adverts in the Our East End newspaper distributed to over 120,000 households, press releases and media briefings securing coverage through the East London Advertiser, Channel S, ATM Bangla.

3.13.3 A total of fifty responses to the consultation have been received as of 18<sup>th</sup> January 2018. Initial analysis of the consultation responses indicate:

- Most respondents agree with the approach of a three year budget as a way of protecting frontline services;
- Almost half of respondents prefer that the council protects frontline services, rather than continue to invest resources in services that are council priorities, or reduce budgets across all services by the same proportion;
- More than half of respondents support a 2% increase in council tax in 2018-19 to support adult social care services, and almost half of respondents support the proposal not to implement any additional inflationary increase in council tax above the adult social care precept of 2%.

3.13.4 The Council's proposed MTFs assumes most of the views of respondents to the consultation. A further update will be provided once consultation closes on the 22<sup>nd</sup> January.

#### **4 COMMENTS OF THE CHIEF FINANCE OFFICER**

- 4.1 As this report is primarily financial in nature the comments of the Chief Financial Officer have been incorporated throughout this report.

#### **5 LEGAL COMMENTS**

- 5.1 The Local Government Finance Act 1992 requires the Council to calculate for each financial year the basic amount of its council tax. This calculation is in accordance with prescribed formulas and the Council is required to submit its council tax base to the GLA between 1<sup>st</sup> December and 31<sup>st</sup> January in the financial year preceding the financial year for which the calculation of council tax base is made. If the Council does not do so then the GLA is required to determine the calculation for itself.
- 5.2 Whilst the making of the calculation is for Council, the preparation of the estimates for consideration is a function of the Executive. This is as per Article 4 of the Constitution. The Budget and Policy Framework Procedure Rules specify the procedure to be followed in developing the budget.
- 5.3 Before calculating the budget requirement, the Council is required to consult with persons or bodies who the Council considers representative of persons who are required to pay non-domestic rates. Appended to this Report is a budget consultation summary for consideration. This consultation complies with the both the Council's statutory and common law duties regarding consultation.
- 5.4 As part of calculating the budget requirement, the Chief Finance Officer is required to report on the following matters: the robustness of the estimates made for the purposes of the calculations; and the adequacy of the proposed financial reserves. The Council must have regard to this Officer's report before calculating the budget requirement. This report contains that Officer's report.
- 5.5 The Council is obliged by section 151 of the Local Government Act 1972 to make proper arrangements for the management of its financial affairs. It is consistent with sound financial management and the Council's obligation under section 151 for the Council to adopt and monitor a Medium Term Financial Strategy as this informs the budget process and is viewed as a related function.
- 5.6 The Council has a duty under section 3 of the Local Government Act 1999 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"). The preparation and consideration of a Medium Term Financial Strategy as part of the budget setting process assists to ensure compliance with this duty.
- 5.7 The report provides information about risks associated with the Medium Term Financial Strategy and the budget. This is consistent with the Council's obligation to make proper arrangements for the management of its financial affairs. It is also consistent with the Council's obligation to have a sound system of internal control which facilitates the effective exercise of the Council's functions and which includes arrangements for the management of risk. The maintenance and consideration of information about risk, such as is

provided in the report, is part of the way in which the Council fulfils this duty.

- 5.8 The report provides details of the revised capital programme. The capital programme does not form part of the determination of the budget requirement, but is nevertheless a closely related matter and it is appropriate for information to be provided about it at this time. Before the capital programme is agreed, there will be a need to ensure that projects are capable of being carried out within the Council's statutory functions and that any required capital finance will meet statutory requirements.
- 5.9 The report provides information about a variety of grant funding, the application of which is governed by agreement or legislation. The report outlines in broad terms the different limitations on grant funding and the Council will have to ensure that it complies with the relevant agreement or legislative requirement, as the case may be, in respect of each grant. It will be for officers to ensure this is the case.
- 5.10 The Equality Act 2010 requires the council in the exercise of its functions to have due regard to the need to avoid discrimination and other unlawful conduct under the Act, the need to promote equality of opportunity and the need to foster good relations between people who share a protected characteristic and those who do not (the public sector equality duty). A proportionate level of equality analysis is required in order to enable the Council properly discharge this duty and in some cases, such as where savings are made which impact on service users, consultation will be required to inform the equality analysis.

## **6 ONE TOWER HAMLETS CONSIDERATIONS**

- 6.1 The Equality Act 2010 and the Public Sector Equality Duty that is part of it incorporates previous anti-discrimination laws into one act and places a duty to embed equality considerations into the day to day work of public bodies, so that they tackle discrimination and inequality and contribute to making society fairer. The PSED requires that public bodies have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity between people from different groups, and foster good relations between people from different groups. As a Council we undertake ongoing equality analyses in policy making, initiating service changes, making investments or undergoing a savings proposal as part of having due regard and in meeting our public sector equality duty. The equality analysis tools which includes checklists and detailed impact assessments enable us to identify the potential implications of our decision on services users and staff and to understand potential adverse impacts on one or more of the nine protected characteristics, as well as identify active mitigation where necessary. The council also undertakes periodic reviews of inequality through the borough equality assessment (BEA) which was last completed in early 2017.
- 6.2 From the BEA and other sources we know that the borough is the 10th most deprived local authority in England, although there are now fewer of the most highly deprived areas in England than before and at the same time is

characterised by some of the highest average earnings. This is evident in the gap in earnings between residents and workers which is the largest in London. There are also high levels of worklessness amongst BME women, BME groups generally and disabled groups. White British attainment remains low in comparison to all other. Healthy life expectancy is significantly lower than national averages for men and women. The borough has the highest rate of pensioner poverty with half of all residents aged 60 and over living below the poverty line, more than three times the rate nationally. 42% of children live in families below the poverty line and almost four in five children in the borough live in families reliant on tax credits. This is the highest rate in Great Britain and nearly double the proportion who are technically below the poverty line. Six in ten tax credit families are in work. We also know that around four in ten households in Tower Hamlets are living below the poverty line, after housing costs are taken into account. This is the highest poverty rate across all local authorities in England and Wales, and almost double the national average. Another indicator of the impact of Welfare Reform and the pressures on households is evident in the rise in the percentage of (working age) Housing Benefit claimants who are in employment which rose from 21% to 45% between 2009 and 2016.

- 6.3 With many public services responding to needs of children and young people, older people and minority groups savings to budgets and therefore changes to services targeting these groups are very likely to impact on protected characteristic groups across these cohorts.
- 6.4 As part of last year's budget setting process for 2017-18 to 2019-20 all savings proposals agreed were subject to equalities impact screening to determine the extent to which an equalities impact is expected. For those projects that were identified as having a potential equalities impact, detailed Equalities Assessments have been or will be carried out prior to implementation.
- 6.5 The current budget setting process for 2018-19 to 2020-21 has identified additional 19 savings proposals. Two of these proposals will be implemented in 2018-19 with the remaining 17 being implemented in 2020-21. Equalities impact screening has been carried out on all new proposals and the outcome of the screening is included in Appendix 4 of the report. Neither of the two proposals to be implemented in 2018-19 have an equalities impact. Of those proposals to be implemented in 2020-21, only three are expected to have an equalities impact and will need to be subject to full Equalities Impact Assessments and resident/user consultation prior to a decision to implement.
- 6.6 Proposals which are related to support functions and will have impacts on staffing and expected redundancies the profile of potential and actual redundancies will be kept under review to assess the impact on equality groups within the Council's staff.

## **7 BEST VALUE (BV) IMPLICATIONS**

- 7.1 The preparation of the MTFFS has taken 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.

## **8 SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT**

- 8.1 The sustainable action for a greener environment implications of individual proposals in the budget are set out in the papers relating to those proposals.

## **9 RISK MANAGEMENT IMPLICATIONS**

- 9.1 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 are set out in Section 3.7 of this report.

## **10 CRIME AND DISORDER REDUCTION IMPLICATIONS**

- 10.1 The crime and disorder implications of individual proposals in the budget are set out in the papers relating to those proposals.

## **11 SAFEGUARDING IMPLICATIONS**

- 11.1 Any safeguarding implications of individual proposals in the budget are set out in the papers relating to those proposals.

## **Linked Reports, Appendices and Background Documents**

### **Appendices**

- Appendix 1A Summary of the Medium Term Financial Strategy
- Appendix 1B Detailed analysis of the Medium Term Financial Strategy by Service Area
- Appendix 2 Tower Hamlets Core Spending Power
- Appendix 3 New growth proposals 2018- 2021
- Appendix 4 New Savings proposals 2018- 2021
- Appendix 5 Reserves Policy
- Appendix 6 Risk Evaluation
- Appendix 7 Projected Movement in Reserves
- Appendix 8A Draft Housing Revenue Account Medium Term Financial Strategy 2018-2023
- Appendix 8B Indicative THH Housing Capital Programme 2018-2023

- Appendix 9A Current Capital programme 2017-2028
- Appendix 9B Increases to Existing Schemes & New Schemes 2018-2028
- Appendix 9C Summary of Proposed Capital Programme 2017-2028
- Appendix 9D Proposed New Schemes 2018-2028
- Appendix 10 Budget Consultation Feedback

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

- None

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## **Appendix 1**

# **SUMMARY AND DETAILED ANALYSIS OF THE MEDIUM TERM FINANCIAL PLAN**

	2017-18	2018-19	2019-20	2020-21
	£'000	£'000	£'000	£'000
<b>Net Service Costs</b>	361,985	345,913	343,703	331,911
<b>Growth</b>				
Approved	(16,344)	(1,416)	1,053	(7,458)
New	15,517	6,769	(6,172)	7,512
<b>Savings</b>				
Approved	-	(13,560)	(13,174)	
Prior Year - deleted		1,256		
New	(20,396)	(1,758)	-	(9,030)
<b>Inflation</b>	5,150	6,500	6,500	6,500
<b>Total Funding Requirement</b>	<b>345,913</b>	<b>343,703</b>	<b>331,911</b>	<b>329,435</b>
<b>Government Funding (RSG)</b>	(53,958)	(43,795)	(33,281)	(30,498)
<b>Retained Business Rates</b>	(131,307)	(135,194)	(139,555)	(139,555)
<b>Council Tax</b>	(85,837)	(93,777)	(98,029)	(103,756)
<b>Collection Fund Surplus</b>				
Council Tax	(1,000)	(1,500)	-	-
Retained Business Rates	-	-	-	-
<b>Core Grants</b>	(68,265)	(51,113)	(52,588)	(50,478)
<b>Earmarked Reserves</b>	(6,094)	(13,094)	(7,593)	(5,478)
<b>Total Funding</b>	<b>(346,460)</b>	<b>(338,473)</b>	<b>(331,047)</b>	<b>(329,765)</b>
<b>Budget Gap (excl use of Reserves)</b>	(548)	5,231	863	(331)
<b>Unallocated Contingencies</b>	-	-	-	-
<b>Budgeted Reserve Contribution GF smoothing (Approved Feb 2017)</b>	548	(5,459)		-
<b>Budgeted Reserve Contribution</b>	(0)	229	(863)	331
<b>Unfunded Gap</b>	-	-	-	-
	<b>31/03/2018</b>	<b>31/03/2019</b>	<b>31/03/2020</b>	<b>31/03/2021</b>
<b>Balance on General Fund Reserves (£000s)</b>	32,288	27,057	26,194	26,525



Detailed Analysis of the Medium Term Financial Plan by Service Area 2017-18 to 2020-21

Appendix 1B

Service	Total	Savings			Growth		Adjustments		Total	Savings		Growth		Adjustments		Total	Savings		Growth		Adjustments		Total
	2017-18 £'000	Approved £'000	Prior year deleted £'000	New £'000	Approved £'000	New £'000	Approved £'000	New £'000	2018-19 £'000	Approved £'000	New £'000	Approved £'000	New £'000	Approved £'000	New £'000	2019-20 £'000	Approved £'000	New £'000	Approved £'000	New £'000	Approved £'000	New £'000	2020-21 £'000
<b>Health, Adult &amp; Community</b>	105,985	(1,985)	717	-	2,057	697	(2,821)	289	104,939	(2,242)	-	2,125	814	(2,122)	(0)	103,514	-	(1,000)	-	3,499	(2,074)	-	103,939
<b>Public Health</b>	33,521	(749)	-	-	(925)	-	-	-	31,847	(411)	-	(730)	-	-	-	30,706	-	-	-	-	-	-	30,706
<b>Children Services</b>	103,462	(2,313)	339	(300)	(135)	879	6	4,718	106,657	(3,011)	-	(414)	-	(370)	(4,487)	98,375	-	(650)	-	-	(2,120)	2,000	97,605
<b>Place</b>	64,610	(2,285)	200	-	578	(141)	1,823	1,392	66,176	(1,781)	-	577	132	(225)	(219)	64,660	-	(580)	-	744	(1,598)	(98)	63,128
<b>Governance</b>	12,751	(4)	-	-	-	-	-	100	12,847	(4)	-	-	-	-	-	12,843	-	-	-	-	-	-	12,843
<b>Resources</b>	25,095	(2,075)	-	-	(252)	80	(7,213)	615	16,250	(525)	-	-	-	-	(200)	15,525	-	(1,900)	-	-	(1,666)	1,367	13,326
<b>Net Service Costs</b>	345,424	(9,410)	1,256	(300)	1,323	1,515	(8,205)	7,114	338,716	(7,974)	-	1,558	946	(2,717)	(4,906)	325,624	-	(4,130)	-	4,243	(7,458)	3,269	321,548
<b>Other Net Costs</b>																							
Capital Charges	6,997	-	-	(1,458)	-	-	-	-	5,539	-	-	-	-	-	-	5,539	-	-	-	-	-	-	5,539
Levies	1,796	-	-	-	-	-	-	-	1,796	-	-	-	-	-	-	1,796	-	-	-	-	-	-	1,796
Pensions	13,290	-	-	-	-	-	-	-	13,290	-	-	-	-	-	-	13,290	-	-	-	-	-	-	13,290
Corporate Contingency	3,150	-	-	-	-	-	-	-	3,150	-	-	-	-	-	-	3,150	-	-	-	-	-	-	3,150
Other Corporate Costs	(25,097)	(4,150)	-	-	196	(1,860)	5,270	(25,642)	(25,642)	(5,200)	-	2,212	(2,212)	-	(30,842)	-	(4,900)	-	-	-	-	(35,742)	
<b>Total Other Net costs</b>	135	(4,150)	-	(1,458)	196	(1,860)	5,270	(1,867)	(1,867)	(5,200)	-	2,212	(2,212)	-	(7,067)	-	(4,900)	-	-	-	-	-	(11,967)
<b>Inflation</b>	354	-	-	-	4,231	2,269	-	-	6,854	-	-	4,440	2,060	-	-	13,354	-	-	-	6,500	-	-	19,854
<b>Total Financing Requirement</b>	345,913	(13,560)	1,256	(1,758)	5,750	1,924	(2,935)	7,114	343,703	(13,174)	-	8,210	794	(2,717)	(4,906)	331,911	-	(9,030)	-	10,743	(7,458)	3,269	329,435
<b>Funding</b>																							
<b>Government Funding (RSG)</b>	(53,958)	-	-	-	10,163	-	-	-	(43,795)	-	-	10,514	-	-	-	(33,281)	-	2,783	-	-	-	-	(30,498)
<b>Retained Business Rates</b>	(131,307)	(4,100)	-	-	214	-	-	-	(135,194)	(4,600)	-	238	-	-	-	(139,555)	-	-	-	-	-	-	(139,555)
<b>Council Tax</b>	(85,837)	-	-	(7,940)	-	-	-	-	(93,777)	-	(4,253)	-	-	-	-	(98,029)	-	(5,726)	-	-	-	-	(103,756)
<b>Collection Fund Surplus</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Council Tax	(1,000)	-	-	(1,500)	1,000	-	-	-	(1,500)	-	-	1,500	-	-	-	-	-	-	-	-	-	-	-
Retained Business Rates	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Core Grants</b>																							
Public Health Grant	(35,974)	-	-	-	925	-	-	-	(35,049)	-	-	730	-	-	-	(34,319)	-	-	-	-	-	-	(34,319)
NHB	(19,330)	(5,000)	-	-	20,407	-	-	-	(3,923)	(5,000)	-	5,741	-	-	-	(3,182)	-	-	-	-	-	-	(3,182)
Strategic School Improvement Fund	(2,772)	-	-	-	2,572	-	-	-	(200)	-	-	-	-	-	-	(200)	-	-	-	-	-	-	(200)
Improved Better Care fund	(1,640)	-	-	(6,071)	-	-	-	-	(7,711)	-	(5,066)	-	-	-	-	(12,777)	-	-	-	-	-	-	(12,777)
Additional Improved Better Care Fund	(7,017)	-	-	-	-	-	2,821	-	(4,196)	-	-	-	-	2,122	-	(2,074)	-	-	-	2,074	-	-	-
Adult Social Care Support Grant	(1,500)	-	-	-	1,500	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Local Lead Flood	(32)	(2)	-	-	-	-	-	-	(34)	(2)	-	-	-	-	-	(36)	-	36	-	-	-	-	(0)
<b>Reserves</b>																							
Earmarked (Corporate)	(6,094)	-	-	-	-	-	114	(7,114)	(13,094)	-	-	-	-	595	4,906	(7,593)	-	-	-	-	5,384	(3,269)	(5,478)
General Fund (Smoothing)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total Financing</b>	(346,460)	(9,102)	-	(15,511)	36,781	-	2,935	(7,114)	(338,473)	(9,602)	(9,319)	17,223	1,500	2,717	4,906	(331,047)	-	(2,907)	-	-	7,458	(3,269)	(329,765)

## **Appendix 2**

# **CORE SPENDING POWER**

CORE SPENDING POWER<sup>1</sup>

## Tower Hamlets

## Illustrative Core Spending Power of Local Government;

	2015-16	2016-17	2017-18	2018-19	2019-20
	£ millions	£ millions	£ millions	£ millions	£ millions
Settlement Funding Assessment <sup>2</sup>	187.9	170.7	158.1	151.1	142.9
Compensation for under-indexing the business rates multiplier	1.5	1.5	1.6	2.5	3.3
Council Tax of which;	69.8	76.9	85.8	96.0	104.4
<i>Council Tax Requirement excluding parish precepts (including base and levels growth)</i>	69.8	75.4	81.8	88.9	96.7
<i>additional revenue from referendum principle for social care</i>	0.0	1.5	4.1	7.1	7.7
<i>Potential additional Council Tax from £5 referendum principle for all Districts</i>	0.0	0.0	0.0	0.0	0.0
Improved Better Care Fund	0.0	0.0	8.7	11.9	14.9
New Homes Bonus <sup>3</sup>	24.8	28.6	23.9	20.7	19.9
New Homes Bonus returned funding	0.3	0.2	0.2	0.0	0.0
Rural Services Delivery Grant	0.0	0.0	0.0	0.0	0.0
Transition Grant	0.0	0.0	0.0	0.0	0.0
The Adult Social Care Support Grant	0.0	0.0	1.5	0.9	0.0
<b>Core Spending Power</b>	<b>284.3</b>	<b>278.0</b>	<b>279.8</b>	<b>283.1</b>	<b>285.4</b>
Change over the Spending Review period (£ millions)					1.1
Change over the Spending Review period (% change)					0.4%

Please see the Core Spending Power Explanatory note for details of the assumptions underpinning the elements of Core Spending Power.

<sup>1</sup> The figures presented in Core Spending Power<sup>1</sup> do not reflect the changes to Settlement Funding Assessment made for pilot authorities. For information about pilots please refer to the Pilots Explanatory Note. For the Settlement Finance Assessment figures after adjustments for pilots please see Key Information for Local Authorities.

<sup>2</sup> 2019-20 Settlement Funding Assessment has been modified to include a provisional tariff or top-up adjustment.

<sup>3</sup> New Homes Bonus allocations for 2019-20 are for illustration purposes only. Actual payments will depend on housing delivery and are subject to change.

# **Appendix 3**

# **GROWTH**

## Additional Growth Bids - Summary

Appendix 3

### Additional Budget Pressures

Directorate	2018/19 £'000	2019/20 £'000	2020/21 £'000	Total £'000
Health, Adults and Community	697	814	3,499	5,010
Children's Services	5,150	(4,180)	-	970
Place	599	(128)	344	815
Governance	100	-	-	100
Resources	695	(200)	(300)	195
<b>Total</b>	<b>7,241</b>	<b>(3,694)</b>	<b>3,543</b>	<b>7,090</b>

Strategic Priority Area	2018/19 £'000	2019/20 £'000	2020/21 £'000	Total £'000
1.1 People access a range of education, training, and employment opportunities and feel they share the benefits from growth	-	-	-	-
1.2 Children and young people feel they are protected and get the best start in life and realise their potential	5,250	(4,180)	-	1,070
1.3 People access joined-up services when they need them and feel healthier and independent	697	814	3,499	5,010
1.4 Inequality is reduced and people live in a cohesive community	195	-	-	195
2.1 People live in a borough that is clean and green	599	(128)	344	815
2.2 People live in good quality and affordable homes and neighbourhoods	-	-	-	-
2.3 People live in safer neighbourhoods and anti-social behaviour is tackled	-	-	-	-
3.0 A focussed and efficient Council co-producing excellent services	500	(200)	(300)	-
<b>Total</b>	<b>7,241</b>	<b>(3,694)</b>	<b>3,543</b>	<b>7,090</b>

### Additional Mayoral Priority

Directorate	2018/19 £'000	2019/20 £'000	2020/21 £'000	Total £'000
Health, Adults and Community	315	273	277	865
Children's Services	447	31	2,031	2,509
Place	856	791	791	2,438
Governance	-	-	-	-
Resources	-	-	1,667	1,667
<b>Total</b>	<b>1,618</b>	<b>1,094</b>	<b>4,766</b>	<b>7,479</b>

Strategic Priority Area	2018/19 £'000	2019/20 £'000	2020/21 £'000	Total £'000
1.1 People access a range of education, training, and employment opportunities and feel they share the benefits from growth	450	451	451	1,352
1.2 Children and young people feel they are protected and get the best start in life and realise their potential	507	91	2,091	2,689
1.3 People access joined-up services when they need them and feel healthier and independent	-	-	1,667	1,667
1.4 Inequality is reduced and people live in a cohesive community	-	-	-	-
2.1 People live in a borough that is clean and green	101	80	80	261
2.2 People live in good quality and affordable homes and neighbourhoods	100	-	-	100
2.3 People live in safer neighbourhoods and anti-social behaviour is tackled	460	473	477	1,410
3.0 A focussed and efficient Council co-producing excellent services	-	-	-	-
<b>Total</b>	<b>1,618</b>	<b>1,094</b>	<b>4,766</b>	<b>7,479</b>

Growth Bids - Additional Budget Pressure Growth

Appendix 3A

Reference	Directorate	New or extension to 2020/21	Title	Strategic Priority Area	Lead Member	2018/19 £'000	2019/20 £'000	2020/21 £'000	TOTAL £'000
GRO/ CHI 01 / 18-19	Children's Services	New	SEND Transport	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Amy Whitelock-Gibbs	1,200	(1,000)	-	200
GRO/ CHI 02 / 18-19	Children's Services	New	A Team Arts - Youth Services	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Abdul C Mukit	170	-	-	170
GRO/ CHI 03 / 18-19	Children's Services	New	Staffing Vacancy Factor	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Amy Whitelock-Gibbs	1,200	(600)	-	600
GRO/ CHI 04 / 18-19	Children's Services	New	Leaving Care	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Amy Whitelock-Gibbs	1,500	(1,500)	-	-
GRO/ CHI 05 / 18-19	Children's Services	New	Edge of Care	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Amy Whitelock-Gibbs	450	(450)	-	-
GRO/ CHI 06 / 18-19	Children's Services	New	Children's Social Care - Section 17	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Amy Whitelock-Gibbs	630	(630)	-	-
			<b>Children's Services Total</b>			<b>5,150</b>	<b>(4,180)</b>	<b>-</b>	<b>970</b>
GRO/ GOV 01 / 18-19	Governance	New	Academy Conversions	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Amy Whitelock-Gibbs	100	-	-	100
			<b>Governance Total</b>			<b>100</b>	<b>-</b>	<b>-</b>	<b>100</b>
GRO/ HAC 01 / 18-19	Health, Adults and Community	Extension to 2020/21	Demographic Pressures in Adult Social Care	1.3 People access joined-up services when they need them and feel healthier and independent	Cllr Denise Jones	697	814	3,499	5,010
			<b>Health, Adult &amp; Community Total</b>			<b>697</b>	<b>814</b>	<b>3,499</b>	<b>5,010</b>
GRO/ PLA 01 / 18-19	Place	Extension to 2020/21	Waste Collection and Treatment	2.1 People live in a borough that is clean and green	Cllr Rachel Blake	(62)	(37)	365	266
GRO/ PLA 02 / 18-19	Place	Extension to 2020/21	Freedom Pass	2.1 People live in a borough that is clean and green	Cllr Amina Ali	(179)	169	379	369
GRO/ PLA 03 / 18-19	Place	New	Food Safety Officers	2.1 People live in a borough that is clean and green	Cllr Amina Ali	100	(100)	-	-
GRO/ PLA 04 / 18-19	Place	New	Public Realm Retenders	2.1 People live in a borough that is clean and green	Cllr Rachel Blake	450	(160)	(110)	180
GRO/ PLA 05 / 18-19	Place	New	Local Plan to 2018 Delivery Package	2.1 People live in a borough that is clean and green	Cllr Rachel Blake	290	-	(290)	-
			<b>Place Total</b>			<b>599</b>	<b>(128)</b>	<b>344</b>	<b>815</b>
GRO/ RES 01 / 18-19	Resources	New	Heritage Collections Backlog	1.4 Inequality is reduced and people live in a cohesive community	Cllr David Edgar	115	-	-	115
GRO/ RES 02 / 18-19	Resources	New	Transitional Support to Manage Housing Benefit Admin Grant Reductions	3.0 A focussed and efficient Council co-producing excellent services	Cllr David Edgar	500	(200)	(300)	-
GRO/ RES 03 / 18-19	Resources	New	Idea Stores Book and Materials Stock Fund	1.4 Inequality is reduced and people live in a cohesive community	Cllr David Edgar	80	-	-	80
			<b>Resources Total</b>			<b>695</b>	<b>(200)</b>	<b>(300)</b>	<b>195</b>
			<b>Total Additional Budget Pressure Growth</b>			<b>7,241</b>	<b>(3,694)</b>	<b>3,543</b>	<b>7,090</b>
			<b>Additional Inflation Requirement</b>			<b>2,269</b>	<b>2,060</b>	<b>6,500</b>	<b>10,829</b>
			<b>Total Additional Budget Pressure Growth and Inflation Requirement</b>			<b>9,510</b>	<b>(1,634)</b>	<b>10,043</b>	<b>17,919</b>

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	SEND Transport
<b>Reference</b>	GRO/ CHI 01 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	Amy Whitelock-Gibbs
<b>Directorate</b>	Children's Services
<b>Service Area</b>	SEND
<b>Lead Officer</b>	Terry Bryan

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs	3,000	1,200	(1,000)	
Income				
Reserves				
<b>Total</b>	3,000	1,200	(1,000)	

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification
<p>The proposed growth bid is for a one off amount of £1.m from the Risk reserve to fund immediate pressures within the service and a recurring £0.2m for growth. Investigative work is ongoing to scrutinise the levels of spending in order to identify potential savings to reduce the pressure on the service.</p> <p>The provision of transport for children and young people with SEND is a statutory duty which is funded through the use of the General Fund contribution to the SEND budget in Children's Services and delivered by the Transport Team. Provision of transport is deemed necessary in order to enable children and young people access appropriate educational provision.</p> <p>The financial pressures in this area are not just an issue in Tower Hamlets. A recent London Councils survey showed that 23 out of 28 boroughs are collectively spending £94 million <b>more</b> on high needs than received from central government – equivalent to a 13.6 per cent funding gap. <b>In addition, there is an estimated average overspend of £1 million per borough on transport for children with SEND.</b> At a London and national level there is continued lobbying of the government to provide adequate funding for these required services.</p> <p>The High Needs Funding Block, ring –fenced funding for SEND pupils, has been capped for several years. There is a modest increase for the financial year 2018-19 but this is not related to pupil numbers. When the year on year increase in pupil numbers is accounted for, it can be surmised that efficiencies are already being made as the over-spend is not increasing in proportion to the additional numbers being catered for.</p> <p>The breakdown of budget pressures which total £1.2m is as follows-</p> <p><u>Cost Code: 81055 – SEN Transport – In House</u> Projected overspend - £675,520</p> <p>This service is for the transport of LBTH pupils with special educational needs from home to school within the borough. The budget was not adequately resourced and therefore carried a year on year over spend. This historic overspend was further exacerbated by a reduction being taken in anticipation of savings to be made by the In-House provider. The required action to realise these savings were not taken by the Transport Service and so resulted in an</p>

apparent increase to the overspend.

Cost Code: 81506 – SEN Transport – External

Projected overspend - £599,724

This service is for the transportation of LBTH pupils with special educational needs from home to schools outside the borough, or to schools not serviced by the In-House provider. It has historically been overspent for a number of years.

Numbers of children with SEND are increasing year on year and there is significant projected growth. Whilst there is some scope for dampening demand, this is limited as the higher relative demand in the borough is likely to be real and arising from the levels of poverty (there is a correlation between SEND and poverty), families moving to TH in order to access outstanding SEND school provision as well as local demographic factors. All applications for transport are scrutinised and children and young people who are able to travel independently are given travel training and are funded to use public transport. A review of the provision of transport will be included in the annual review to ensure as children grow and mature, their capacity for independent travel will be assessed.

A forensic scrutiny of spending on transport is being undertaken and although there is expected to be some scope for savings, it is unlikely to be significant in the short term. In the longer term work is being undertaken on strategic pupil place planning for specialist provision and this has the scope to reduce costs in relation to External SEN Transport, but this will involve capital investment and therefore a long timescale to have an impact on the budget.

**Budgeted Outcomes/ Accountability (Focus on Improved performance)**

The Council must make transport arrangements for all children who cannot reasonably be expected to walk to school because of their mobility problems or because of associated health and safety issues related to their special educational needs (SEN) or disability. Eligibility, for such children is assessed on an individual basis to identify their particular transport requirements. Usual transport requirements (e.g. the statutory walking distances) cannot be considered when assessing the transport needs of children eligible due to SEN and/or disability.

**Risks & Implications**

- Risk to the effectiveness of assessment and review process
- Risk of additional demand led funding pressures
- Risk to ability to demonstrate a fair and robust needs based individual assessments and re-assessments in accordance with the LA's statutory duties.
- Risk of legal challenge at SEN Tribunal

**Value for Money & Efficiency**

A study undertaken by external consultants in 2016 concluded that a further 'best value' review was needed to determine where there was opportunities for efficiency savings, including a cost benefit analysis of the Borough's in house transport services to decide whether it should be outsourced. The best value review will also include an examination all aspects of the policy, entitlement criteria and operational arrangements for the provision of home to school transport for pupils with special educational needs. Work for the review will be overseen by Interim Divisional Director Youth and Commissioning and is expected to be completed before 31 March 2018. Any efficiencies identified will contribute towards savings in both Adults and Children's directorates. The review will also help manage the risk from demand led pressures and legal challenges.

Within the SEND service, a bespoke pupil place planning project is underway which will model relatively accurate projections of pupil numbers and allow more strategic planning including, if shown to be necessary, for local capital projects to accommodate the growing demand without adding disproportionately to transport costs.



<b>Growth Type</b>	Budget Pressures
<b>Title</b>	A Team Arts - Youth Services
<b>Reference</b>	GRO/ CHI 02 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	Cllr Abdul C Mukit
<b>Directorate</b>	Children's Services
<b>Service Area</b>	Youth Service
<b>Lead Officer</b>	Claire Belgard

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs		100		
Other Costs		70		
Income				
Reserves				
<b>Total</b>		170		

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	3	3		

Description & Justification
<p>The proposed growth bid is for a £0.170m permanent base budget adjustment to fund the A team Arts – Youth Services as detailed below. The 2017/18 pressure has been funded by Mayor's reserve.</p> <p>Prior to the current financial year 2017-18 the A Team Arts was funded through a £170,000 Service Level Agreement payment to Arts, Parks and Events. This funded the 3 FTE employees plus some overheads for the use of the Brady Arts Centre and activity costs for projects. During the budget planning process for 2017-18 and beyond, which was closely aligned with the youth service review and restructure and savings proposed in the medium term financial plan, it was intended that this SLA would end from 31<sup>st</sup> March 2017. During the 2017/18 budget setting process an additional amount of funding of £300,000 was requested to be drawn down from the Mayors Reserve to fund two pilots and cover the cost of the A Team Arts for one year. The team has subsequently been moved into the core youth service. If the pilots result in a requirement for future funding this will be assessed separately however a need has already been identified to continue funding A Team Arts as part of the youth service beyond the current financial year.</p>

### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

The A Team Arts is currently one of the highest performing areas of the youth service delivering the highest numbers of accredited outcomes for young people in an informal education setting in Tower Hamlets. Students on the A Team Arts programmes are regularly successful in their applications to university to study arts related subjects.

In the last performance year the A Team delivered over 100% of all performance targets sets and achieved 91 certified and 45 accredited outcomes, this represents a cost for the £170K budget of £1,250 per accredited outcome. A Team Arts also historically attracts a more diverse group of young people than the universal youth service, attracting a much more ethnically diverse group and significantly higher numbers of young women.

All youth service projects, including A Team Arts have been measured against targets for:

- Contacts (numbers of young people accessing provision and registering their details)
- Participants (numbers of registered young people accessing the same provision five times – counted once)
- Accredited outcomes (numbers of young people who have completed an accredited training course)

As noted above A Team has historically achieved all their performance targets and achieve accredited outcomes at a lower cost than other provision in the service. For the current year 2017-18 and future years to which this growth bid relates they have been set the same level of performance target.

From October 2017 the youth service is introducing an outcomes framework which has been coproduced with the community and voluntary sector and young people, this will capture a range of measures that better reflect the outcomes sought through engagement with the youth service, these are:

- Young people have an increased sense of agency in their lives and their communities
- Young people feel more optimistic about their futures
- Young people are better able to access holistic and supportive opportunities across the borough of Tower Hamlets
- Young people increase their critical thinking skills

These will be measured through a range of user voice questions scored on a scale of 1-5 at set points within the young person's journey with an overall target of an increase of 20% by 2020. Individual projects, including A Team Arts will be set targets for 2018-19 and 2019-2020 once the 2017-18 baseline has been established.

The youth service outcomes link to the council strategic objective "Creating opportunity by supporting aspiration and tackling poverty"

### **Risks & Implications**

A Team Arts is very well regarded within the local community and has key partnerships with high profile organisations such as Central St Martins Central St. Martin's College of Art, Queen Mary University and Tower Hamlets Arts Music Education Service. The team have delivered award winning projects such as Her Link in association with public health which raises awareness of child sexual exploitation and was shown at the Edinburgh Fringe Festival. There is significant reputation risk in withdrawing funding from the service.

### **Value for Money & Efficiency**

A Team Arts offers good value for money as evidenced in the outcome cost comparison, moving the team into the youth service in the current year has also offered some efficiency in terms of working practices as the team are now running more projects in the universal youth service which is providing more young people the opportunity to access informal learning and reduces the teams dependence of delivering through schools. Although this does not reduce the cost of the service, a large part of which is staffing, it does provide a more effective method of delivery.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Staffing Vacancy Factor
<b>Reference</b>	GRO/ CHI 03 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	Cllr Amy Whitelock-Gibbs
<b>Directorate</b>	Children's Services
<b>Service Area</b>	Children's Social Care
<b>Lead Officer</b>	Nancy Meehan

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	23,634	1,200	(600)	
Other Costs				
Income				
Reserves				
<b>Total</b>	23,634	1,200	(600)	

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification
<p>This growth bid is for £1.2m to fund the vacancy factor pressure on children's social care staffing (exc admin), detailed below. £0.6m will be funded in base budget and £0.6m will be funded as a one-off from Transformation reserves.</p> <p>Children's Services Directorate have an in built vacancy factor which was introduced as part of the budget savings in 2013 – 2014. This is no longer sustainable in the present climate. Following the recent Ofsted inspection that rated Children's Social Care as inadequate there has been a noticeable and predicted increase in work throughout the whole of Children's Services. The increase in demand since 1.4.2017 is evidenced by a 15% rise in work and an increase in monthly contacts of 41% and in referrals an increase of 66%. Although the service has expanded as part of the redesign, this has not been sufficient to continue to hold a vacancy factor in the overall staffing establishment.</p> <p>Caseloads have increased and the work continues to be complex. There is a noticeable increase in the child protection figures and those children requiring safeguarding responses. This is likely to continue for a significant time during the period of intervention and improvement. This bid requests additional funding to mitigate the budget pressure in maintaining a 6% staffing vacancy factor.</p> <p>The original staffing budget was forecast with an agreed 6% vacancy rate to be held across the former Directorate of Education, Social Care and Wellbeing and continued when separate Directorates were established for Adults and Children's Services in 2015. Within Children's Social Care there is a need to maintain a full complex of staffing establishment to manage the work pressures. Presently all vacancies have required filling with agency workers, this relates to not only vacancies but also long term sick and maternity. The result being two fold the overspend on the budget due to not maintaining the vacancy factor but also the use of agency which comes with added expense due to the rate of fees associated to this cohort of staff. There are currently 11 staff in Children's Social Care on maternity leave, 10 of which have a front line role (mostly social workers). Sickness absence is currently an average of 9.36 days per employee, of which 6.87 days is long term absence (periods of sickness lasting 20 days or more). During the last year, 51 employees in Children's Social Care have had a period of absence of 20 days or more which would have either resulted in agency cover being used or additional pressure placed on already stretched staffing resources to maintain a safe level of service.</p>

The vacancy factor accounts for approximately £1.2 m of the overspend alongside covering for those positions where there is long term sick and maternity. The cost of agency to address this demand is forecast at £1.7m

The underlying pressure therefore amounts to £2.9m. This growth bid seeks to agree an increase in budget until 2019 to compensate for the current demand and consequent pressure on the workforce by which time the on-going budget needs will be identified as service demand is expected to have stabilised and benefited from other planned changes, for example, the improve Early Help offer.

### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

Priority one – children get the best start in life and young people realise their potential.

### **Risks & Implications**

The expenditure is inevitable as part of the response to an inadequate judgement. Although there was a previous commitment to maintain a 6% vacancy rate across Children Social Care and other Children's Services, failing to provide sufficient funding will mean the service is unable to adequately respond to the present increase in work.

By not having sufficient workforce with a manageable level of caseloads, it will result in deterioration to the service provided to children and their families which presents a safeguarding risk for them and risks the health and wellbeing of staff in addition to the risk of damaging the Council's reputation. There is also a risk that Ofsted will, on future monitoring visits, not evaluate the Council as delivering the improved performance that have been committed to which will result in a form of external intervention of the management of Children's Social Care.

### **Value for Money & Efficiency**

This is an area of statutory responses for service delivery as identified in legislation and regulations. The requirement to respond is non-negotiable and the LA is at risk both in reputation but also by not fulfilling its safeguarding responsibilities.

To mitigate the risk of not maintaining sufficient staff, our current recruitment and retention offer has been reviewed to ensure it is competitive. Recruiting permanent staff will reduce the need for agency workers, this is unlikely to impact in the current financial year. It is therefore likely the service requires a growth bid of £1.2m to reverse the 6% vacancy factor. The agency related problems should ease in year 2018 – 2019 as we recruit a more stable and permanent workforce.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Leaving Care Service
<b>Reference</b>	GRO/ CHI 04 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	Amy Whitelock-Gibbs
<b>Directorate</b>	Children's Services
<b>Service Area</b>	Childrens Social Care
<b>Lead Officer</b>	Nancy Meehan

Financial Information	Budget Allocation		Growth Bid	
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	892			
Other Costs	1,316	1,500	(1,500)	
Income	(15)			
Reserves				
<b>Total</b>	2,193	1,500	(1,500)	

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification
<p>The proposed growth bid is for a one off amount of £1.5m from the Risk reserve to fund immediate pressures within the Leaving Care Service (LCS). Investigative work is ongoing to scrutinise the levels of spending in order to identify potential savings to reduce the current pressure on the service. In addition there is a current review of Leaving Care and 16+ services with an aim to reduce future pressures.</p> <p>2017/18 unfunded Pressure £1.3m - This growth bid (£1.5m) includes £1.3m of unfunded pressure which was not identified for the 2017/18 budget build process. The justification for this pressure is stated in the below.</p> <p>Request for an increase in the core accommodation budget for Care Leavers. This is due to there being an increase in the number of young people with complex needs entering the LCS cohorts, which has required LCS in sourcing more specialist supported accommodation provisions. These placements often range from £900 per week up to £2,200 per week. In order to match care leavers' needs with the supported accommodation provisions, has resulted in the current overspend. Some of the key factors requiring high supported placements are as follows:</p> <ul style="list-style-type: none"> <li>• Trafficked children with complex needs moving on leaving care service</li> <li>• High risk child sexual exploitation cases becoming adults with high level of vulnerability</li> <li>• Substance misuse issues</li> <li>• Sex working</li> <li>• Violence</li> <li>• Gang affiliation (danger to themselves and others and mostly like will require out of borough placements)</li> <li>• Unaccompanied asylum seekers (not having access to public funds)</li> <li>• Emotional and mental health related cases that does not always meet adult threshold</li> <li>• Disabilities</li> <li>• Learning Difficulties</li> <li>• LCS inheriting cases where care leavers have inadequate level of independent skills that requires high supported placement to help focus on developing basic living skills.</li> <li>• Rough sleepers</li> </ul>

**Other factors impacting upon the increase in the use of complex and high supported accommodation:**

- General increase in the number of care leavers entering the LCS with both low to medium as well as high support needs;
- New legislation placing a duty upon Local Authority (LA) LCS teams to provide support, including accommodation until the Age of 25 (previously up to the age of 21) (Children and Social Work Act 2017);
- Placement breakdowns requiring higher level of supported accommodation;
- The nature of LASPO (Legal Aid, Sentencing and Punishment of Offenders) Act 2012 cases feature themes around gangs and violence, substance misuse and drug dealing and Sexual Exploitation;
- On-going ROTA Referral (Asylum) cases.

This growth bid will help forecast (financial as well as commissioning accommodation providers) and meet the needs of care leavers in line with the statutory responsibilities and duties. Thus enabling a smoother transition to adulthood and better outcomes (employed or in education / training/ suitable accommodation). Additionally this can have financial savings in the long term for the LA as a whole.

**Budgeted Outcomes/ Accountability (Focus on Improved performance)**

- Ensure that the Local Authorities statutory obligations under the Children Act 1989 and the Leaving care Act in relation to providing services for children and young people who have been looked after and eligible for leaving care services
- To ensure that the Local Authority is compliant and prepared for OFSTED improvements visits which are currently taking place, over the forthcoming 2 years.
- For the Local Authority to demonstrate and support those care leavers to have equal opportunities to enjoy and achieve and have better life chances .

**Risks & Implications**

**Statutory Duty:**

The Local Authority (LA) has a statutory responsibility as a corporate parent to provide suitable accommodation to care leavers, and can be prone to judicial review if it does not discharge its duty accordingly.

**Risks associated with lack of adequate suitable accommodation:**

1. DFE Performance Indicator of Suitable Accommodation being low;
2. Below 'Good' rating from OFSTED Inspection: Inability to adequately plan and provide suitable accommodation that meets care leavers' needs (See below for Criteria for 'GOOD');
3. Poor Outcomes for LBTH Care Leavers: Care Leavers may become homeless, risk to themselves and others, and remain NEET post case closure, resulting in bleak prospects for their future;
4. Resulting in the increase in the number of care leavers accessing services through Adults Social Care and other costly services.

**Impact upon OFSTED Rating:**

The LA will need to demonstrate to OFSTED Inspectors the following criteria to achieve a 'Good' Rating:

- Care leavers are safe and feel safe, particularly where they are living, and are helped to understand how their life choices will affect their safety and well-being.
- Care leavers succeed in their transition to greater independence and adulthood at a time that is right for them.
- Risks of tenancy breakdown are identified and alternative plans are in place.
- Accommodation for care leavers is appropriate for each young person to safely develop their independence skills.
- Care leavers develop the skills and confidence they need to maximise their chances of successful maturity to adulthood, including parent-hood. This includes learning to budget, to live independently and to manage safe

relationships and behaviour.

- Care leavers have access to appropriate education and employment opportunities, including work experience and apprenticeships.
- Care leavers are progressing well and achieving their full potential through life choices, either in their attainment in further and higher education or in their chosen career/occupation.

The costs for Accommodation are statutory and viewed to be essential ingredients in achieving at least a 'Good' Rating from OFSTED.

**Accommodation Breakdown:**

Table 1 below provides a breakdown of the number of current cohort of care leavers placed in the range of accommodation (as at End of Aug 2017). Please note the LCS is anticipating an intake of a further 77 cases from the current Looked After Children Cohort within the next 12 months. This does not include any LASPO or Rota Referral cases:

Type of placement	Numbers
Foster care/Staying Put	12
Family/friends perm	22
Family/friends temp	18
Hospital	2
Self-contained	1
HPU perm	2
HPU temp	3
Prison	17
Private rented	6
Residential	18
Supported	80
Shared	59
Staying put	10
Tenancy HA	17
Tenancy LA	19
Unknown	11
<b>Total</b>	<b>297</b>

This Growth Bid relates specifically those marked in **PINK**.

**Table below shows figures relating to historical spend and current spend and forecast. This is likely to change subject to further cases transferring to LCS**

LA is in the process of undertaking a feasibility study into reshaping the LCS to a **16 - 25 service (currently LCS is a 18 plus service)**, if this happens, then we are anticipating an increase of (132 case from the CLA service), additionally due to the duty imposed by the Children and Social Work Act 2017 there is likely to be an increase of further 229.

Totalling a 658 Care Leavers needing to provide support services.  
Future Forecasting of Breakdown

Age Band	No of Cases
16	55
17	77
Current Cohort	297
21- 25 (Cases falling under the Children and Social Work Act 2017)	229
<b>Total</b>	<b>658</b>

The approval of increasing the baseline budget for accommodation will help LCS operate within a realistic budget framework, which will facilitate the LCS to appropriately meet the statutory responsibilities as corporate parents, as well as meeting the long term needs of the care leavers through effective planning, sourcing and commissioning suitable accommodation

### Value for Money & Efficiency

Over the last 12 months there has been a large increase of young people entering the Looked After service. In addition, this cohort group has predominantly aged 10-15. Further analysis of the performance data has identified that during the period April 2014 to March 2017; children aged 10 – 17 accounted for 65% (403) of the population entering the care system and of which 54% are between the ages of 10 and 15. Only 60 children (10%) below the age of one became looked after over the same period.

On looking at the monthly cycle; there is not significant seasonal effect on the rate of entry into care with the exception of that of younger teens. The main activity months in the last 3 years appear to be in the months of October and November.

In the year to date, a total of 45 children became looked after and of which seven had previous care experiences. Eighteen children (39%) were aged 16 and over when they entered the care system.

The number of care applications made to the courts by Tower Hamlets has increased substantially in recent years. In comparison that of Tower hamlets is now ranked 2<sup>nd</sup> highest amongst its statistical neighbours compared with its 9<sup>th</sup> position in 2013/14.

The overall proportion of children exiting care is almost the same as the entering care in Tower Hamlets. In the period April 2014 – March 2017; a total of 633 children were discharged from care compared with 619 admitted into care over the same period.

Seven in ten of children leaving care are aged 10 and over and of which half are aged 18 at the time of leaving care. The age distribution of children leaving care is in line with national average, however, fewer proportions of older teenagers left care in 2017 compared with previous years.

The majority of children (61%) that left care in the period April 2014 to March 2017 did so within six months of entering care. Children aged 10 and above account for 40% share of all discharges from care in the same period and those aged 4 and under account for only 13% (81). Children leaving care on turning age 18 account for 32% of the cohort.

At the end of March 2017, 60% of children leaving care did so within 6 months of coming into care indicating an increase of 5.6% increase from 2015. Less than 7% of those ceasing care were looked after for 2 years and over.



A total of three hundred and seven young adults are in receipt of leaving care services at the end of July 2017 comprising of 114 females (37%) and 192 males (64%). These figures also include 31 young adults aged 16 and 17 currently in care (eligible).

A total of three hundred and seven young adults are in receipt of leaving care services at the end of July 2017 comprising of 114 females (37%) and 192 males (64%). These figures also include 31 young adults aged 16 and 17 currently in care (eligible).

The majority of service users are between the ages of 18 and 20. Fifty-five (18%) young adults receiving leaving care support are young unaccompanied asylum seekers and 80% are aged 18 and over.

What does seem clear from the information pertained above, is that LBTH have increased its cohort group of older LAC children and the population of these older younger people have very complex needs, thus placement provision and placement stability have been challenging. The growth bid will enable more robust provision for placement provision; moreover, this will enable older young people to have the opportunity remain in borough. This will enable more effective planning for accommodation earlier on. Sufficient time to develop partnerships with placement providers. Care leavers will have access to suitable accommodation that meet their needs; Care leaver's progress well and achieve their full potential, thus increasing social mobility, independence and employability. Reduction of homelessness amongst care leavers.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Edge of Care
<b>Reference</b>	GRO/ CHI 05 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	CLlr Amy Whitelock-Gibbs
<b>Directorate</b>	Children's Services
<b>Service Area</b>	Children's Social Care
<b>Lead Officer</b>	Nancy Meehan

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs		400	(400)	
Other Costs		50	(50)	
Income				
Reserves				
<b>Total</b>		450	(450)	

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification
<p>The growth bid is for a one-off amount of £0.450m from the Transformation/ Improvement Reserve to fund an Edge of Care Service as detailed below.</p> <p>The aim of the service is to reduce the numbers of children and young people with emotional difficulties and psychological problems who become looked after by the Council.</p> <p>The service proposal will ensure that there is integrated work with partner agencies to ensure young people aged 11 to 17 and their families experience real choice with regard to their care/support.</p> <p>It will ensure all agencies working with children, young people and their families are working towards agreed and meaningful outcomes that will help to realise and support the aspirations and goals of each client.</p> <p>That all front line staff (social work, health, social care, education, third sector) working directly or indirectly with young people and their families are appropriately trained and enabled to recognise and support children and young people and their families who are experiencing or may be experiencing emotional problems.</p> <p>It will ensure that each child, young person and their family, has a robust, agreed service or integrated care plan that enables them to be active participants developed in full partnership with the lead professional in their case.</p> <p>The service will plan, provide and oversee intervention packages to ensure each child or young person and their families who access the service are supported and encouraged to view the service provided as a brief intervention that will enable a return to routine and self-maintained life as soon as possible.</p> <p>It will provide a service that promotes and encourages each child, young person and their family to continue to live normal life as possible whilst receiving services, and will ensure that communities have the following:</p> <ul style="list-style-type: none"> <li>• A named facilitator to work alongside the lead professional to coordinate each individual case</li> <li>• A service that utilises a range of evidenced based approaches/interventions to support young people to</li> </ul>

realise their ambitions and goals and encourages positive pro-social behaviour

- Achieves excellent outcomes for young people, families and carers
- Is needs led and ensures effective participation of children, young people, families and carers
- Is responsive and easily accessible and that actively works to reduce stigma surrounding mental ill health
- Embeds Edge of care and prevention as key service components, providing increased community support, and ensuring that less, young people and their families have need of or are referred to tier 3 social work services
- Demonstrates a "can do" approach supporting multi agency and disciplinary collaborative working
- Edge of care will work with the older young people to provide wrap around service to reduce the need for care entry.

LBTH responds to children needs as identified in the threshold document.

Tier 1 emotional well-being services are provided by a range of professionals from Health, , allied health professionals, third sector agencies and education to provide early intervention, signposting, support, prevention strategies, mentoring, to children, young people and their families.

Tier 2 services are supported or provided by Targeted Services teams and other professionals. These services are provided by Targeted professionals. They support early identification and early intervention, working other professionals as part of the 'Team Around the Child,' to support the care of the young person.

The aim of the edge of care team is to work with those children at the high ended level of need who require statutory services. Tier 3 and 4 services are for young people with more severe, complex or persistent disorders who may require accommodation from the local authority if their needs are not met. The project will work closely with Social Work practitioners to plan and provide intervention packages including sustaining young people stepping down from accommodation.

In the financial year 16/17 approximately 85 children and young people over the age of 10 entered care and required accommodating by the local authority. As part of the edge of care service LBTH has already been successful in securing MST and FFT via a social impact bond which will respond to 24 of this cohort of children. In the represent accommodation it is believed that at least 50% of this cohort of children will potentially result in requiring residential accommodation (based on present figures of 4 in internal residential and 26 in external residential) the cost of this can be estimated at approximately 4.6 million (based on average cost of residential of £3000 per week). For the other 50% the likelihood is that foster care would be an option, costing £780 000, (based on an average cost of £500 per week as a combination of internal and IFA).

The proposal is to establish a Edge of Care team as a invest to save to support intensive packages of wrap around care to those children on the Edge of Care to support them in remaining safely with family and in the community.

To provide an evidence-informed assessment of the young person and their vulnerabilities using a recognised assessment tool.

The Service will:

- Respond to urgent referrals on same day/next working day
- Provide out of hours services to meet planned and urgent needs
- Planned consultation, support and guidance from a specialist young people's practitioner

A wide range of evidence based interventions will be made available to enable real choice for every child, young person and family member. The recovery model will be adopted and promoted as the overarching theme for the whole service. Putting recovery into action means focusing care on supporting recovery and building the resilience of young people with emotional and mental health problems, not just on treating or managing their symptoms.

Based on the present cohort of 60 children this would require approximately 8 workers to be available to support these young people. This is based on a model of 6 to 8 week intensive responses to young people and maintaining an average case load of 8 children. The cost associated with this is approximately £40,000 per year (without on costs) x 8

= £320,000 (without on cost) per year. This equates to £400,000 inclusive of 25% on costs which is required as recurrent funding. An additional £50,000 one off cost for training is also being requested.

Number of young people (10-17 p.a. eligible for services)	Number of support staff required to deliver intensive 6-8 week interventions	Staffing (inclusive of on costs)	Costs	Training (systemic therapy, motivational techniques and understanding the behaviour of older young people)
60 (excludes 24 young people that will be referred to MST/FFT programme)	8 FTE	£400k per annum recurrent		£50k one off cost

This service would work closely with CSC teams, placement teams, providers, key stakeholders including CAHMS to support young people to remain safely in community.

The additional staff will provide an out of hours intervention service which is currently not available in existing teams.

#### Budgeted Outcomes/ Accountability (Focus on Improved performance)

Priority one – Children get the best start in life and young people realise their potential  
Ensure better outcomes for looked after children and young people

#### Risks & Implications

The service believes that for many teenagers, positive outcomes are more likely when families receive effective edge of care support and outreach services than by the young person entering care.

Intensive interventions for children and young people edging towards care, at risk of exclusion and/or exploitation will be delivered to support children remaining out of care. Research is clear that outcomes for older young people entering care in the main are poor.

If we cannot deliver an effective Edge of Care programme, the care cohort will continue to evidence the older age range entering into care, which not only impacts on placement budget as these young people tend to move into residential but also the Leaving care budget and there is limited permanency options available for these young people to exit care to other legal permanency options.

#### Value for Money & Efficiency

This is an Invest to Save model in that investing in this service will reduce the need for more expensive residential placements and high cost provision which in the long term will reduce the placement budget.

On the basis of the financial modelling above, the financial investment will potentially lead to the avoidance of costs of approximately £4.9m.

Project to start immediately with the edge of care service to be fully implemented by January 2017.

KPIs to be formulated and reported quarterly with a review at 9 months.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Children's Social Care - Section 17
<b>Reference</b>	GRO/ CHI 06 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	CLlr Amy Whitelock-Gibbs
<b>Directorate</b>	Children's Services
<b>Service Area</b>	Children's Social Care
<b>Lead Officer</b>	Nancy Meehan

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs	382	630	(630)	
Income				
To Reserves				
<b>Total</b>	382	630	(630)	

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification
<p>This growth bid is for a one off amount of £0.630m from the Risk reserve to fund the pressures within the Section 17 Children In Need (CIN) budget. Under Section 17(1) of the Children Act 1989, local authorities have a general duty to safeguard and promote the welfare of children within their area who are in Need; and so far as is consistent with that duty, to promote the upbringing of such children by their families, by providing a range and level of services appropriate to those children's needs. Investigative work is ongoing to scrutinise the levels of spending in order to identify potential savings to reduce the pressure on the service.</p> <p>The current projected overspends in Children Social Care (CSC) as at September 2017/18 are</p> <ul style="list-style-type: none"> <li>Family Support and Protection (FSP) £185,000</li> <li>No Recourse to Public Funds (NRPF) £130,000</li> <li>Assessment and Intervention (A&amp;I) £124,000</li> </ul> <p>This totals £439,000 in 2017/18. However we are expecting further pressure on the section 17 budget as outlined below.</p> <p>In April 2017, the Ofsted inspection report was published which rated LBTH as inadequate. Within the area of FSP that was severely criticised was the Councils Children's social care response to private fostered children and those children who were subject to pre proceedings process under the PLO framework. A further area of concern is the increase in numbers of children subject to Child Protection (CP) plan and CIN resulting in a requirement to support these families which in many case, means financial support to maintain the children remaining at home.</p> <ul style="list-style-type: none"> <li>Those children subject to Public Law Outline (PLO) are our most vulnerable with the threshold for care proceedings being met. Pre proceedings are applied whilst most children remain with their parents. Historically there has been significant drift and delay in this area. Those cases in PLO exceeded 12 weeks, sometimes extended to over 12 months. The statutory guidance for pre proceedings is 12 weeks, 16 weeks at the outside, for those more complex cases. A review of these highlighted that the delay was due to not commissioning appropriate assessments as this required the financial element to be borne by the Local</li> </ul>

Authority (LA) under its section 17 budget.

- Drift and delay at all aspects of the child's journey was acknowledge. A review of cases is being undertaken resulting in more children being escalated to Child protection process and it is envisaged as this scrutiny continue of those cases within CP, more children will enter the pre proceedings process. Resulting in further financial pressures.
- Private Fostering (PF) was a specific area for attention in the Ofsted report where significant improvement activity is taking place. This is likely to increase the identification of private fostering arrangements and the need for associated support services. Following a review of all the private fostering cases some have resulted in Special Guardianship Orders being granted and further number are being supported to obtain orders and formalise the arrangements where private fostering arrangements do not meet the regulations. Where carers refuse obtaining Parental Responsibility (PR), and where there is no parent exercising PR, the LA will be seeking legal advice which could result in PF children becoming Looked After Children (LAC). Again the cost of legal advice and court applications is borne by the section 17 budget that is managed in the FSP service.
- A further demand relates to the transfer of families with no recourse to public funds where these children require long term support and place additional pressures on the section 17 budget. The substantial costs for both support and housing is met by section 17 spend across the service. The CSC have no control over the length of time that these cases remain open as the decision making is led by the home office and the immigration legislation. Only a percentage of these costs are covered by the government grant as the long term costs associated with such cases significantly increase.
- FSP also hold the Prevent cases (radicalisation) due to the sensitivity of this work, most of the cases are heard in the High court resulting in inflated costs due to the need to instruct QC or the equivalent. There are currently 6 families open to the Prevent team which is equivalent to 12 children. Any case resulting in legal action will involve a High Court application costing £2500 to begin with and legal representation costing approximately £250 per hour. Depending on the length of the case in Court, a standard Prevent case could cost the local authority between £50-£70,000.

#### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance

- Ensure Local authority's statutory obligations under the Children Act 1989 to provide services for children in need
- Ensure Local Authority is compliant with statutory guidelines and timescales in relation to children in proceedings and pre-proceeding
- Ensure private fostering arrangements are assessed and reviewed in accordance with the private fostering regulations 2005.
- Ensure children and young people have the opportunity to remain in the local area and community
- Ensure children receive support at the right stage of their journey in the social care system

#### **Risks & Implications**

Statutory Duty;

The Local authority (LA) has a statutory response to safeguard children at risk of harm, this includes those children who are subject to private fostering, potentially trafficked children and those who meet threshold for initiating care proceeding about are being managed under the Pre proceedings process.

#### **Risks identified by Ofsted**

- Ofsted immediately identified that the private fostering arrangement for children in LBTH were unsafe. There was a lack of understanding of the legal framework in response to private fostering. Children who may have been trafficked or abandoned were not safeguarded sufficiently.
- Ofsted identified that there was drift and delay in pre proceedings and children were not effectively

safeguarded or protected within this process for far too long.

- Ofsted found the application of threshold across the entire child's journey was inconsistently applied and left children at risk of harm

#### **Impact on Ofsted rating**

The LA will need to demonstrate to OFSTED Inspectors the following criteria to achieve a 'Good' Rating.

- That the pre proceedings work is completed within statutory timeframes of 12 weeks. (16 maximum with more complex cases). In order to do this the assessments required, which are usually externally commissioned, need to be completed swiftly
- That drift and delay is reduced particularly in those cases held within the child protection process. There is a review ongoing of all children under the age of 8 who are subject to CP for more than 12 months – this is likely to further significantly increase the pre proceedings cases.
- That those children who are subject to private fostering process are adequately protected and safeguarded with clear assessments. That ensures that families are able to access legal advice which is financed by the LA to secure these children with legal permanent options.

#### **Value for Money & Efficiency**

Robust assessment and intervention during the CIN and CP process reduces the need for many cases to escalate into further statutory involvement such as LAC. However this ability has to be based on the availability of the Social Worker to build relationships and therefore this requires a manageable caseload to be able to deliver the intervention.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Academy Conversions
<b>Reference</b>	GRO / GOV 01 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	CLlr Amy Whitelock-Gibbs
<b>Directorate</b>	Governance
<b>Service Area</b>	SPP / Legal
<b>Lead Officer</b>	Layla Richards

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	0	101.625		
Other Costs	0	33.875		
Income	(40.5)	(35.5)		
To Reserves	0			
<b>Total</b>	(40.5)	100		

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	0	2		

Description & Justification
<p>Academy conversions have increased in the borough in the past year with 8 schools having either been converted / currently in the process of converting. This is a significant increase on previous years, but it is likely that schools and their Governing Bodies will continue to take the decision to convert to academies in the coming years. While schools receive a £25K grant from the DfE towards their conversion costs local authorities do not receive any extra funding. As a result, the Council incurs costs for which it is not funded. To mitigate this, a schedule of charges for any school converting to an academy was introduced for schools converting after 1 May 2017. Costs incurred by the Council are mainly officer time in SPP and Legal, but also Building Development, Asset Management and HR.</p> <p>This bid assumes that there will be 5 conversions in a year with 75% of those being standard community school conversions and 25% requiring additional work as PFI schools. The income included above is therefore calculated on this basis. The bid is essentially for two full-time posts to support conversions. One post is a senior lawyer post and the other is a project manager post. Other costs factored in include a legal property cost which is calculated on a fixed rate per conversion.</p> <p>Local authorities have no choice but to support schools to convert to an academy once they have received an Academy Order.</p>

Budgeted Outcomes/ Accountability (Focus on Improved performance)
Local authorities have no choice but to support schools to convert to an academy once they have received an Academy Order.

Risks & Implications
Without appropriate resourcing there is a risk that conversions are not supported in a timely manner which can lead to complaints from schools. There is a reputational risk if appropriate resourcing to support academies is not made available.
Value for Money & Efficiency



This year a schedule of charges for schools converting to academies has been introduced which will mitigate some of the cost to the Council. This bid builds in a senior lawyer post which will enable legal support to be provided in-house rather than going out externally thereby providing better value for money. It will also enable the Council to build in-house capacity and skills to support conversion work going forward.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Demographic Pressures in Adult Social Care
<b>Reference</b>	GRO / HAC 01/ 18-19
<b>Strategic Priority Area</b>	1.3 People access joined-up services when they need them and feel healthier and independent
<b>Lead Member</b>	Cllr. Denise Jones
<b>Directorate</b>	Health, Adults and Community
<b>Service Area</b>	Adult Social Care
<b>Lead Officer</b>	Karen Sugars

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs	61,590	2,754	2,939	3,499
Income				
Reserves				
<b>Total</b>	61,590	2,754	2,939	3,499

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification								
Information should include a brief description of the growth requirement; evidence of numbers; cost drivers; impact on outcomes; reasons such as changes in legislation etc								
The growth calculation assumes that increases in population, combined with other demographic factors detailed below will lead to more clients needing social care support for longer. The estimated average rate of growth per client group is different and is influenced by a number of factors such as age, ethnicity, deprivation and other such demographic factors.								
Client Group	Total Budget 2017/18	Estimated Growth Rate	Growth Required 2018/19	Total Budget 2018/19	Growth Required 2018/19	Total Budget 2019/20	Growth Required 2020/21	Total Budget 2020/21
	£'k	%	£'k	£'k	£'k	£'k	£'k	£'k
OP	30,190	3.50%	1,057	31,247	1,094	32,341	1,132	33,473
PD	6,984	2.70%	189	7,173	194	7,367	199	7,566
LD	18,583	5.60%	1,041	19,624	1,147	20,771	1,624	22,395
MH	5,833	8.00%	467	6,300	504	6,804	544	7,348
<b>Total</b>	<b>61,590</b>		<b>2,754</b>	<b>64,344</b>	<b>2,939</b>	<b>67,283</b>	<b>3,499</b>	<b>70,782</b>
Predicted population growth in Tower Hamlets will inevitably bring an increase in the number of people who need adult social care services. Tower Hamlets has high levels of deprivation, which in turn is associated with poor mental and physical health. Deprivation levels may be further exacerbated by welfare reform. An increase in the number of people living for longer with poor health is also a factor driving an increase in demand for adult social care across all client groups.								
There is likely to be an increased demand for adult social care from all sections of the population as it continues to								

expand. Based on the latest GLA projections, the borough's population is expected to grow by 22% between 2016 and 2026, equating to an average annual population growth rate of 2.2%, and a resident population of 364,500 in 2026. By 2021, the population will have increased to 337,600, an annual average growth rate of 3.3%. In absolute terms the projected growth is mainly in the lower working age range (people aged 30 to 49), but over the course of the next decade, the age structure of Tower Hamlets is expected to shift, with the proportion of young adults in their twenties and thirties decreasing and the proportion of older adults increasing.

High levels of deprivation are strongly linked to poor mental and physical health. Tower Hamlets is the 10th most deprived local authority in England out of the 326 local authorities (based on Indices of Multiple Deprivation 2015 data). There is also a link between some learning disabilities and poverty. Possible explanations include poor nutrition and low uptake of screening programmes and antenatal care, which increase the prevalence of learning disabilities. Levels of deprivation may be further worsened by welfare reform changes which are starting to come into effect. It is likely that this may have an impact on demand, due to the evidence that high levels of deprivation are a driver for increased need for social care services.

Trends show that increases in healthy life expectancy have not kept pace with improvements across London or in the improving trend in total life expectancy locally. If the extra years from increased longevity are mostly spent in disability and poor health, there will be an increase in demand for social care across all client groups.

Older people in Tower Hamlets have worse health in many areas compared to England and London averages. In addition, a higher than average proportion of older people in the borough live alone. Older people who live alone are significantly more likely to have a social care need (linked to loneliness and isolation) than those who do not live alone. Survival rates of young people with profound and multiple learning disabilities are improving and this cohort is now coming through to adulthood. Tower Hamlets is a young borough and there is considered to be a higher rate of learning disabilities in the school-age population. Due to a complex set of reasons, there are higher prevalence rates of profound and multiple learning disabilities in children of a Bangladeshi ethnic background. Tower Hamlets has a significant Bangladeshi community.

The Tower Hamlets Mental Health Strategy Needs Assessment lists a number of "risk factors" and "protective factors" in relation to mental health. On some of these, Tower Hamlets has been shown to face a greater challenge than the rest of London (carers, older people, drug and alcohol misuse) but all need attention because of the specific risks they pose to mental health or because all are linked to the high levels of deprivation which exist in the borough.

This bid uses estimated growth rates from the Greater London Authority's Housing-linked Projections and the Department of Health sponsored systems 'Projecting Adult Needs and Service Information' (PANSI) and 'Projecting Older People Population Information' (POPPI) Systems. The latter two systems combine population projections with benefits data and research on expected prevalence rates to produce projections of the likely future demand on social care and health services. Projections from POPPI and PANSI for previous years have proven to be reasonably accurate and we are satisfied that these are the most robust figures available for calculating projections of future growth in ASC demand.

**Budgeted Outcomes/ Accountability (Focus on Improved performance)**

Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance

This growth bid relates directly to the Council's priority to have "More people living healthily and independently for longer", and is necessary to ensure the Council can fulfil its statutory duties to residents needing care and support.

## Risks & Implications

Highlight Service/ Corporate associated;

### Older People

There has been a progressive increase in services provided to older people since 2009/10. Despite the various one off efficiency savings the actual spend on commissioned older people's services has increased by 19.1% over the past five years. Due to the health and demographic factors, demand for adult social care services from older people is predicted to continue to increase between now and 2021. There is a forecasted annual average growth rate of 3.5% until 2021 therefore the growth requirement in 2018/19 for Older People Services is estimated at £1,057k.

Home care, which is particularly heavily used by older people in Tower Hamlets, is expected to continue to be under growing pressure over the next 8 years. Separate growth bids cover rising unit costs in home care (related to the introduction of the Ethical Care Charter and the annual uprating of the London Living Wage), but do not include any allowance for rising demand, which is dealt with here.

### Clients with Learning Disabilities

The Tower Hamlets Joint Strategic Needs Assessment 2015/2016 factsheet: Preparing for adulthood for young people with physical disabilities and/or learning difficulties shows that Tower Hamlets has a younger population than England as a whole. Over the next 5- 10 years the population of Tower Hamlets is predicted to increase. In the 14-25 year old age group, the population is expected to increase by 10.9% by 2020 and 16.9% by 2025<sup>1</sup>. This population growth will have an impact on scale of need and demand for all health and social care services including those concerned with transition.

### Young people in transition in Tower Hamlets

Overall the JSNA shows that in 2015 there were 838 young people in the transition age group. The annual number of young people transitioning from Children to Adults services can be better estimated using service data from the Children With Disabilities team and the Community Learning Disability Service (CLDS) and the Children with Disabilities team. The table below gives an indication of the number of young people identified by children's services as having needs which may be met by Adults services and the number of young people who are assessed and accepted by and the adults CLDS service. The table includes the number of young people supported by Children with Disabilities Team in Children's Social Care, and the number of young people eligible for the Community Learning Disability Service in Adult's Social Care (**Table 1**).

**Table 1: Annual numbers of young people transitioning from children's to adults services 2011-2014**

	Young people identified by Children's Services a likely to need support as adults		Young people in assessed by adults services
Year	Young people (aged 14 and above) with an allocated social worker in the Children With Disabilities Team	Looked after young people (aged 14 and above) in the Children with Disabilities Team	Young people aged 16-18 assessed eligible for Community Learning Disability Service (CLDS)
2014	79	13	43 eligible and 16 awaiting assessment
2013	86	9	30 assessed 24 eligible
2012	97	10	33 assessed 24 eligible
2011	93	7	46 assessed 41 eligible

### Future trends

<sup>1</sup> GLA, Population projections, 2014.

Assuming that the prevalence of learning disability and physical disability remains the same the population of young people in transition could also be predicted to increase by 10.9% increase by 2020 and a 16.9% increase by 2025.

This would mean an estimated 930 young people (aged 14-19) preparing for adulthood by 2020 and 980 young people preparing for adulthood by 2025 (aged 14-19).

Using the year 9 tracking record that CLDS maintain in partnership with special education and Children's Services, an anticipated 35 new referrals are expected in 2017/18; 46 new referrals in 2018/19, and 55 in 2019/20. The average cost of a transition care package is: Lowest £15, 000, Middle: £62,000, Highest £125,000+

Using the referral and eligibility data from the above table 1, this indicates that an average of 70-80% of referrals lead to the identification of eligible needs being met. This estimate together with the mid-range cost suggests a gross growth requirement of;

LD Transition Clients	2017-18	2018-19	2019-20	2020-21
New Referrals	35	46	55	66
Eligible (70%-80%)	28	37	38.5	46
Exits	20	20	20	20
Additional demand	8	16.8	18.5	26.2
<b>Growth (at £62k)</b>	<b>£496,000</b>	<b>£1,041,600</b>	<b>£1,147,000</b>	<b>£1,624,400</b>

The recent trend is that children with more complex needs are coming through; increasing the need for complex and specialist care packages in the high cost range and therefore a higher percentage of those referred up to 2020 may be eligible.

### **Mental Health Clients**

Evidence suggests there has been a steady increase in the number of adults who have a mental health problem and who are eligible to receive support from adult social care. Projecting Adult Needs and Services Information (PANSI) has a number of future predictions for mental health prevalence rates amongst working-age adults in Tower Hamlets. This information is categorised according to mental health condition, and does not give an indication as to who might be eligible for adult social care. In addition to this general growth in the number of MH clients there are also particular pressures in Tower Hamlets on the number of mental health forensic placements. The combined effect of this is forecasted to lead to an annual growth requirement of approximately 8%.

### **Clients with Physical Disability**

The causes of physical disabilities and sensory impairments in working-age adults are complex. This information along with predictions on future prevalence rates is not detailed in this report. Evidence suggests there has been a moderate increase in demand in the number of working-age adults who have a physical disability or sensory impairment and who are eligible to receive support from adult social care.

Projecting Adult Needs and Services Information (PANSI) has a number of future predictions for physical disability and sensory impairment prevalence rates amongst working-age adults in Tower Hamlets. This information is categorised according to health condition, and does not give an indication as to who might be eligible for adult social care. The forecast shows an average annual increase of 2.7%, which is likely to lead to a growth requirement of £189k for 2018/19.

### **Value for Money & Efficiency**

Provide justification for VFM & Efficiency

The amounts required for growth is intended to meet the assessed eligible needs of vulnerable individuals and in many instances will pay for homecare, day care, meals, direct payments and residential and nursing care services.

Scrutiny on the quality of assessments and their value for money in legally meeting assessed needs is central to social care operational practice. The identification of needs to be met as a duty must be funded. The eligibility criteria are set nationally via regulations within the Care Act, which has a threshold of significant impact on wellbeing as the benchmark on where the duty is reached. This demand led service is therefore very sensitive to demographic changes and the accompanying assessment practice.

Overall the budget has seen increased unit costs, especially in the Home Care and residential care area which combined with an increase in the number of adults receiving home care, day care and direct payments has resulted in increased budget pressures. The development of extra care sheltered housing (ECSH) as an alternative to residential care, at an average annual cost of £9,676 per service user against £28,600 per residential placement, has been another efficiency driver. Compared to other London authorities, we are a low user of residential care as we seek to offer choice to our service users and focus on them maximising their independence in their community

<b>Growth Type</b>	Budget Pressure
<b>Title</b>	Waste Collection and Treatment
<b>Reference</b>	GRO / PLA 01 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Lead Member</b>	Cllr Rachel Blake
<b>Directorate</b>	Place
<b>Service Area</b>	Public Realm
<b>Lead Officer</b>	Roy Ormsby

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs	12,464	324	344	365
Income				
To Reserves				
<b>Total</b>	12,464	324	344	365

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification
<p>Information should include a brief description of the growth requirement; evidence of numbers; cost drivers; impact on outcomes; reasons such as changes in legislation etc</p> <p>In the 3 year period 2018/19 to 2020/21 waste collection and treatment costs will increase due to growth in the quantity of Municipal Waste brought about by the economic recovery remaining steady along with the anticipated growth in the resident and day time population levels within the borough.</p> <p>According to GLA 2015 round population projections (SHLAA, Capped household size), the population will rise from 304,000 in 2017 to 374,000 in 2026, with the number of households increasing to 155,391. By 2020, the number of households is estimated to have increased by 3,000.</p> <p>This bid is addressing the financial shortfall that such growth will create.</p> <p>The details are set out below:</p> <p><b>Growth in Waste Treatment and Disposal Costs</b></p> <p>The Council currently has contracts in place for the treatment and disposal of waste and recyclable materials that utilise spare operating capacity at existing waste facilities within and around London. The Council's residual Municipal Waste and Other wastes (organic and healthcare waste) are managed through a contract with Corys, which will run until 2027.</p> <p>The sorting of the Council's dry recyclable material is managed under a separate contract which is operated by Bywaters (Leyton) Ltd which will run until March 2019.</p> <p>A number of assumptions have been made in calculating the funding required. These are :</p> <ul style="list-style-type: none"> <li>• that the calculated growth is based on the actual tonnages in 2016/17 and will continue to grow in line with the GLA SHLAA household projection rate,</li> <li>• that it is known that the markets for recyclable materials have remained depressed and that Local Authorities will continue to be charged a processing fee for dry recyclable materials,</li> <li>• that the gate fee price for processing the Council's dry recycling will increase in line with current market conditions.</li> </ul>

**Growth Calculation:**

The calculations are based on charges levied on a unit rate basis per tonne of waste treated or disposed of.

The current waste disposal contract is due to expire in 2027 and the unit rate per tonne of waste treated that will be levied for the years 2018/19 to 2020/21 are therefore unknown. The current cost per tonne is £79.50 for municipal residual waste and the current CPI indexation of 2.9% has been applied each year to calculate the rate for 2018/19 onwards.

As part of the re-procurement process for the waste disposal contract, future growth in waste tonnages has been calculated. This has been worked out using the GLA SLHAA household projections and has been used to calculate cost of growth required.

**Municipal Residual Waste:**

The estimated tonnage of residual waste in 2017/18 is 103,539 tonnes

Year	Estimated Residual Waste Growth (Tonnes)	Cost per Tonne (£)	Cost of Growth (£)
2018/19	3,417	79.50 – 81.81	£275,572
2019/20	3,530	81.81 – 84.18	£292,921
2020/21	3,646	84.18 – 86.62	£311,363

**Dry Recycling:**

A new MRF contract started in April 2017 and the gate fee price is dependent on the levels of contamination within each load. The higher the contamination the higher the gate fee. There is a range of levels from one to five with prices from £20.65 to £133.77 per tonne. The estimate is calculated assuming a percentage for each level based on actual load collected in April 2017.

The growth requirement in 2018/19 is assumed on the basis of the amount of recycling being delivered to the MRF increasing in line with the general growth of recycling for 2017/18 @ 3.3%.

The same set of assumptions have been used to estimate the growth requirement for 2019/20 and 2020/21 with the addition of a gate fee price increase capped at 2% per year

Year	Additional Tonnage	Cost per Tonne (£)	Cost of Growth (£)
2018/19 (includes 3.3% waste growth)	426 tonnes	Range from £20.65 to £133.77 per tonne	£31,340
2019/20 (includes 3.3% waste growth)	441 tonnes	Range from £21.25 to £137.65 per tonne	£33,069
2020/21 (includes 3.3% waste growth)	455 tonnes	Range from £21.86 to £141.64 per tonne	£34,818



Other Wastes (Organic wastes and healthcare waste):

Year	Tonnage (combined, difference)	Cost per Tonne (£)	Cost of Growth (£)
2018/19	172	Various rates apply	£17,288
2019/20	177	Various rates apply	£18,485
2020/21	182	Various rates apply	£19,123

The growth in Other Waste types have been taken from the workings used for the re-procurement of the new waste disposal contract. The charge for the disposal and treatment of these waste types varies. A 2.9% indexation rate rise has been applied to the gate fee prices each year based on the 2017/18 prices.

#### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance

#### **Risks & Implications**

Highlight Service/ Corporate associated;

The Council has a statutory obligation to treat and dispose of the Municipal Waste that is generated within the borough and the quantity of Municipal Waste will increase year on year with the growth in the number of housing units and associated population increase and projected increases in economic performance. Because the services for waste treatment and disposal are charged for on a per tonne basis the cost associated with the growth in the quantity of Municipal Waste is inescapable.

There are a number of variables that could have an impact on the waste treatment and disposal budget:

- economic recovery increases the average amount of waste produced per property.,
- the percentage of non-conforming loads and contaminated material increases and we are charged at a higher processing rate.

The bid for 2018/19 to 2020/21 is based on the retendered waste contract which commenced during 2017.

The directorate has developed a model to track the borough's waste tonnage and the waste disposal cost projections to provide insight in the potential pressure on financial provision and future demand for the services. The projections show that there has been a steady increase in the amount of waste produced per household as the economy recovered from the recession in 2008. It is expected this waste growth to level out to reach a plateau. However, the level of this plateau is currently unknown and the Borough will experience increasing pressure on its waste services as the population increases. The projections are continually reviewed and reassessed to inform the budgets and the Medium Term Financial Strategy process.

**Value for Money & Efficiency**

Provide justification for VFM & Efficiency

The Council has made significant strides in mitigating the costs of waste treatment and disposal by maintaining levels of diversion from landfill disposal to other forms of waste treatment and reducing exposure to the increases in Landfill Tax with the cost per tonne.

In addition, the Council's contracts for waste treatment and disposal services have recently been procured through open competition under OJEU using a Competitive Dialogue process which has secured competitive gate fee prices.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Freedom Pass
<b>Reference</b>	GRO / PLA 02 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Lead Member</b>	Cllr Amina Ali
<b>Directorate</b>	Place
<b>Service Area</b>	Public Realm
<b>Lead Officer</b>	Roy Ormsby

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs	9,034	13	365	379
Income				
Reserves				
<b>Total</b>	9,034	13	365	379

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification
<p>The Freedom Pass scheme provides free travel on public transport for pass holders over 60 and registered as disabled throughout London. The scheme is administered by London Councils and decisions on apportioning the costs of the scheme between boroughs are made by Members of London Councils' Transport &amp; Environment Committee.</p> <p>London Councils manage the negotiation of the Freedom Pass settlement with TfL and the allocation process between all the London Boroughs of their respective budget contributions to TfL. The methodology for this is as follows :-</p> <ol style="list-style-type: none"> <li>1. TfL state the overall Freedom Pass cost for London</li> <li>2. London Councils receive a DfT grant towards Freedom Passes (about 11% of total cost)</li> <li>3. The DfT grant is then deducted from the total cost to calculate the cost payable by Boroughs towards the scheme.</li> </ol> <p>London Councils has in the past apportioned the deficit to boroughs based on usage data (bus and underground) in proportion to Relative Needs Formula.</p> <p>In December 2013 London Councils' Transport &amp; Environment Committee revised the method of apportionment to move away from the 'Relative Needs Formula' to one based wholly on usage. The method remains in place for the future calculation of the apportionment of the scheme between boroughs. The decision on the size of the deficit to be apportioned to boroughs is usually taken at the December meeting of the London Councils' Transport &amp; Environment Committee. Following this the bid will then be updated to reflect the decision.</p>

Budgeted Outcomes/ Accountability (Focus on Improved performance)
<p>The schedule produced by London Councils has been re-based to show the contribution required by LBTH in 2018/19. The assumptions made for the growth figure for 2019/20 is based firstly on the anticipation that there will not be a reduction to the overall payments made by London boroughs in 2018/19 of £346,594 million. Secondly no significant use of reserves planned by London Councils to reduce the costs in future years and thirdly no major changes in usage. The 2018/19 settlement has been approved at the London Councils Leaders' Committee in the Autumn 2017. Updated schedules have been circulated to boroughs confirming the impact for each individual authority.</p>

### Growth Calculation:

#### Assumptions:

- Inflation added to borough contribution in line with RPI (July 2017)
- The council's proportion of the allocation of cost remains unchanged at 2.61%.
- London Councils settlement was agreed in December 2017 for 2018/19.

Inflation	YEAR	BORO CONTRIBUTION £'000	LBTH % of Total	LBTH £'000	GROWTH £'000
0.46%	2018/19	346,594	2.61%	9,046	13
3.9%	2019/20	358,242	2.61%	9,399	365
3.9%	2020/21	365,049	2.61%	9,765	379

#### NOTE:

1. TFL settlement does not include the cost of the am journeys
2. Bus, Tram, Underground and DLR costs are apportioned by respective usage.
3. London Overground and National Rail costs are apportioned as 70% by the respective usage and 30% by the proportion of previous year's Formula Funding.
4. Non TFL buses and reissue elements are apportioned by proportion of the previous year's Formula Funding allocated to boroughs (as calculated by Central Government)

There is an admin fee also charged by London Councils' for managing the Freedom Pass operation for 2018/19.

Calculations are based on the schedule of contributions provided by London Councils which reflect the factors highlighted in the section below.

### Risks & Implications

The Council is bound to pay a contribution to the Freedom Pass scheme and may not legally withdraw from the scheme. The apportionment methodology is determined by the Boroughs working through London Councils.

The settlement is usually confirmed annually in December which provides the information on what the Authority's annual contribution will be based on for the next year. The figures provided for, in this growth bid for future years reflect the same assumptions as per the current regime, this will be subject to change once further information is available from London Councils

Other work currently being undertaken on demographic and social changes within the Borough indicate that the Authority has an increasing population which may mean an increased demand for freedom passes. It should be noted therefore that further re-basing exercises undertaken by London Councils moving away from RNF to usage could mean that the Authority's contributions will again rise (comparative to other local authorities) in future

### Value for Money & Efficiency

The Authority has no individual control over the amount of money levied upon it to fund the Freedom Pass scheme. Arguably the Freedom Pass scheme represents value for money in offering enhanced mobility to traditionally less mobile members of the community and enhances sustainable travel by encouraging the use of public transport.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Food Safety Officers
<b>Reference</b>	GRO / PLA 03 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Lead Member</b>	Cllr Amina Ali
<b>Directorate</b>	Place
<b>Service Area</b>	Environmental Health and Trading Standards
<b>Lead Officer</b>	David Tolley

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	549	90	(90)	
Other Costs	144	10	(10)	
Income	(52)			
Reserves				
<b>Total</b>	641	100	(100)	

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	9	2		

Description & Justification
<p>Information should include a brief description of the growth requirement; evidence of numbers; cost drivers; impact on outcomes; reasons such as changes in legislation etc</p> <p>This is a request for an additional Food Safety Officer to work within the Food Team. The team currently has 9 staff, the annual Food Safety Enforcement Plan, which is an annual report that needs to be signed off by Cabinet identified a shortfall of 3.5 FTE. The proposal provides for a revaluation of service needs and requirements in 2018/19.</p> <p>This gap in provision has been the result of the increase in food premises over the year, the demand for inspections to review food hygiene rating scores achieved by businesses and the increase in service requests.</p> <p>The service has been managing this shortfall over the years, but the gap has become wider due to extra demands and there are only so many low risk activities that we can stop doing.</p> <p>If the Authority fails to deliver a comprehensive Service, the Food Safety function can be taken from the Authority and given to the Food Standards Agency – whereby we will be required to fund an adequate Service. The food function is also under scrutiny via annual returns to the FSA and consumer interest groups publish an annual rating list of local Councils and their performance, we are slipping down this ranking.</p>

Budgeted Outcomes/ Accountability (Focus on Improved performance)
<p>Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance</p> <p>This request will assist with the demand that is placed on the Team and will ensure that performance is above where remedial action may need to be taken.</p>

**Risks & Implications**

Highlight Service/ Corporate associated;

The council could have the Service taken away from its control and highlighted as poor performing

**Value for Money & Efficiency**

Provide justification for VFM & Efficiency

Each extra staffing resource will ensure that public health risks are minimised and that performance levels are satisfactory to the monitoring agency.

<b>Growth Type</b>	Budget Pressure
<b>Title</b>	Public Realm Contracts Retender
<b>Reference</b>	GRO / PLA 04 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Lead Member</b>	Cllr Rachel Blake
<b>Directorate</b>	Place
<b>Service Area</b>	Public Realm
<b>Lead Officer</b>	Roy Ormsby

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs		240		(110)
Other Costs		210	(160)	
Income				
To Reserves				
<b>Total</b>		450	(160)	(110)

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)		3.5	3.5	1.5

Description & Justification
<p>The bid is the growth required to fund the procurement project arrangements that will be needed to deliver both the Waste contracts and Highways.</p> <p>The costs of the projects cannot be met from within the existing budget resources. The total growth provision is indicative and will need to be reviewed to ensure sufficient resources from reserves are in place to support the size and scale of each of the procurement processes.</p> <p><u>Waste</u></p> <p>The procurement process for the waste contracts includes refuse collection, recycling collections, street cleansing and associated services. The value of the current contracts is in the region of £19 million per annum. The existing contracts will expire in March 2020. A procurement project has been set up to facilitate the retender process and to ensure that the new contracts will be in place so that service delivery is not impacted.</p> <p>The level of involvement and expectations, from the process, will require a dedicated team which will be drawn from the existing Waste Services staff with backfilling arrangements put in place, as well as the need for additional Legal, Procurement, Commercial and Finance support for the project.</p> <p><u>Highways</u></p> <p>The procurement process for the Highways contracts includes Highways Maintenance, Highways Capital, Street Lighting maintenance and Street Lighting Capital. The value of the current contracts is in the region of £13 million per annum. The existing contracts will expire in September 2019. A procurement project will need to be set up to facilitate the retender process and to ensure that the new contracts will be in place so that service delivery is not impacted.</p> <p>Due to the specialist nature, it is proposed to employ x2 contracts specialist to facilitate and deliver the project. It is assumed internal Legal, Procurement and Finance will support the delivery.</p>

### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

Achieving an optimal outcome will necessitate the use of dedicated and appropriately skilled Council staff and other resources to undertake process and service reviews, benchmarking activities and identify areas of best practice that are transferable to Tower Hamlets, reviewing current policy, developing new policy and actions plans that will deliver change and ultimately drafting Service Specifications that will formulate the basis of the new contracts. To put this into perspective, should there be as little as a 1% deviation from the optimal service standards and specifications for the long term services the outcome could see an additional £2.2M (at today's costs) added to the overall cost of the services over the life of the contracts.

### **Risks & Implications**

Highlight Service/ Corporate associated;

If funding is not approved it will not be possible to deliver a quality procurement process for the complex and high value services. The need to ensure that delivery of contracts with a tender value of circa £19m per annum for a minimum of eight years (£152m over the life of the contract) for the Waste Service and £13m per annum for a minimum of five years (£65m over the life of the contract) for the Highways Service have substantial financial implications to the council. Not to mention the continuation of service delivery at the end of the current contracts.

### **Value for Money & Efficiency**

The cost of the procurement project of £2.2m is representative of 1% of the life value of the contracts. The procurement process is also expected to deliver a level of savings, whilst improving on service delivery and meeting the council's Waste/Recycling aspirational targets.



<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Local Plan to 2018 Delivery Package
<b>Reference</b>	GRO / PLA 05 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Lead Member</b>	Councillor Rachel Blake
<b>Directorate</b>	Place
<b>Service Area</b>	Planning & Building Control
<b>Lead Officer</b>	Owen Whalley

Financial Information	Budget Allocation		Growth Bid	
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	288	288		(288)
Other Costs	2	2		(2)
Income				
Reserves				
<b>Total</b>	290	290		(290)

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	5.1	5.1		

Description & Justification
<p>A new Statutory Local Plan is only required every 5 to 6 years as the older plan becomes out of date and ineffective in managing development pressures and securing the best outcome for the borough. It takes around 2/3 years to prepare a new Plan and this was identified as a priority of the most recent Mayoral administration. The current structure and resource capacity of the Strategic Planning section is not staffed in business as usual state at a high level to absorb this responsibility, so the approach has always been to supplement it at the relevant time.</p> <p>To enable us to progress this Local Plan process a Local Plan Place (LPP) Project team was created and has been supported over the last 12 months with funding from Planning &amp; Building Control reserves. As this is no longer an option this growth bid is seeking support to continue the funding of the team, through the final stages of the lengthy process to ensure that the Council's new Local Plan can be delivered to Adoption by Full Council later in 2018/19.</p> <p>The team includes the following roles:</p> <p>LPP Team Leader LPP Principal Urban Design Officer LPP Strategic Transport Planning Officer LPP Growth Monitoring Officer LPP Neighbourhood Planning Officer (.6) LPP Engagement and Communication Officer (.5)</p> <p>This project team has been focussed on place based aspects of the plan, including relevant policy development, area masterplanning, strategic site allocations, site development capacity and options assessment, transport and infrastructure impacts and community engagement in these matters. Essential areas of work that lacked permanent resource at a level to deliver the new Plan.</p> <p>This final stage has two main parts which involves:</p> <ul style="list-style-type: none"> <li>- Supporting and delivering the Plan through a detailed Examination in Public, with a Government appointed examiner. There may be some additional challenges coming from that and it is worth bearing in mind that in the past, within London certainly, LBTH's Public Examination is usually the most detailed, challenging and well</li> </ul>

attended. The development industry are careful at this stage to take every opportunity to test and scrutinise everything we do. Policies can stand or fall on this basis. We are always at the forefront of tackling issues within policy that relate to deliverability, pushing our priorities which do not always coincide with those of the market such as affordable housing provision for local people. It is at this stage that policy is properly tested.

- The Plan then needs to progress through to Adoption at Full Council. This likely to be later in 2018/19.

To ensure we have a section that is able to do this and focus on producing a plan, with all the evidence required to enable us to be as robust as possible we need the additional resources of the Local Plan Place Project Team.

The Local Plan is our statutory planning policy document. The policies in this document set the vision, objectives and policy direction for how we as an authority want to see Tower Hamlets be developed. It's policies are targeted at leading, managing and delivering substantial growth and if kept up-to-date have a better chance of creating and maintaining a vibrant and successful place including improved place making and all the benefits from developments that enable the Council to:

- provide more housing and especially affordable and affordable family housing for residents;
- secure funding and space for infrastructure such as schools, health facilities, transport, public realm and open spaces;
- secure resources to support and maintain a wide range of other often locally led initiatives;
- provide funding and support to deliver economic development, employment and training initiatives;

As our growth levels are the highest in London, our housing target is the largest and our record of delivery is improving we need an ambitious and robust plan in place as quickly as we can. This project team provides the additional capacity the Strategic Planning section and the service needs to complete this task and present the best plan possible at this time.

#### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

The wider Strategic Planning function has prioritised the delivery of a new local plan in line with the Strategic Plan objectives and milestones as shown below:

- *Priority Outcome 2: Creating and maintaining a vibrant and successful place*
- *4. Manage development pressure through the preparation of a new Local Plan and provide effective local infrastructure, services and facilities*
- *Complete key stages in the proposed regulation 19 submission Local Plan* Owen Whalley (PLACE) 31/07/17

The Local Plan Place project team has been focussed on delivering against this 17/18 Strategic Plan Priority Outcome. The key stage has been delivered in 17/18 but the process continues into 18/19 (as will this process of preparing a new Local Plan).

The Local Plan Place project team is needed to ensure that the Strategic Planning function delivers this outcome in 2018/19 and provides the framework to secure all the associated benefits for the Council from having an up-to-date Local Plan.

#### **Risks & Implications**

The Directorate and the Divisional Risk Registers identify:

*Risk 1: Too much of the wrong development in the wrong place without infrastructure. Risk Category: Resources*

One of the Main control measures is: Produce a new Local Plan.

The Implications of not actively mitigating this risk include:

- Reduced affordable housing
- Reduced benefits for the local community

- Increased costs for the Council in fighting and losing appeals
- Poor place-shaping, neighbourhoods not functioning
- Reduced New Homes Bonus and other funding such a council tax and business rates if development is delayed/deterred
- Poorer designed buildings approved
- Reputational damage and special measures on appeal decisions
- Social cohesion and unrest issues emerge

#### **Value for Money & Efficiency**

There is no base budget for this specific project team. Once the Local Plan Place team has completed its input into the Local Plan process the team is disbanded, as a project team and the need for the resources identified in this bid discontinued. This is anticipated to be fully completed by end of 2018/19.

As the production of an up-to-date Local Plan is a statutory requirement, in the past the Division has utilised reserves in a structured way and created a fund that builds over a time period to enable it to fund, when required, the additional costs of the plan-making process. It is a significant commitment and requires additional technical staff, a sustained and detailed period of evidence base gathering and an extensive period of public consultation, amendment and formal challenge periods through to adoption at Full Council. The process can take 2-3 years and is, in a growing Borough, needed every 4/5 years to remain up-to-date.

To this end the Division recommends resources are continued to be assigned as a contribution from any surplus, generating each year towards future plan-making processes, this way prudently allotting resources over time to cover a known cost parameter in the future.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Heritage Collections Backlog
<b>Reference</b>	GRO / RES 01 / 18-19
<b>Strategic Priority Area</b>	1.4 Inequality is reduced and people live in a cohesive community
<b>Lead Member</b>	CLlr David Edgar
<b>Directorate</b>	Resources
<b>Service Area</b>	Idea Store
<b>Lead Officer</b>	Tamsin Bookey, Heritage Manager

Financial Information	Budget Allocation		Growth Bid	
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	257	103		
Other Costs	21	12		
Income				
Reserves				
<b>Total</b>	278	115		

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	6	9		

Description & Justification
<p>Tower Hamlets Local History Library &amp; Archives has been collecting archives and providing free public access to them since 1965, with an archivist first appointed in the early 1980s. The library inherited (and has since has been adding to) extensive collections of historic materials requiring permanent preservation – the largest quantity being records transferred from the local authority itself which it has a statutory function to maintain.</p> <p>The collections are typically acquired more quickly than they can be processed by staff (ie catalogued onto an online searchable database, repackaged in acid-free boxes, and made available to the public for research). This is due to a combination of factors: longterm under-resourcing requiring c.60% of staff capacity to be spent on customer service rather than back-office collections management tasks; plus a storage facility which is outdated and became full in 2005. A feasibility study has been commissioned to address the capital requirements – these are not in scope of this growth bid.</p> <p>An Internal Audit report of March 2017 gave the library <u>Limited Assurance</u> due principally to the inadequate storage facilities for collections and the extensive cataloguing backlog which dates to the 1980s. It is estimated that approx. 50% of the collections stored are uncatalogued and therefore not accessible, whether by the public or LBTH officers or Members researching legacy issues.</p> <p>Following this audit, submission of a growth bid for fixed-term staff to tackle the cataloguing backlog was cited as a management action and was sanctioned by Audit Committee at its meeting of 29/9/17. There are three strands to the growth bid proposal:</p> <ol style="list-style-type: none"> <li>1) We seek to recruit one full-time archivist (SO1) fixed-term for three years who would have no other duties except for cataloguing. They would recruit and manage volunteers to assist them. The table below shows how we have quantified the cataloguing time required to clear the backlog:</li> </ol>

	Deriving from LBTH	Deriving from other sources*
Uncatalogued collections	c. 200	c.285
Total number of files	16,410	9858
Average cataloguing rate (files per month per person)	250	250
Total number of months required	66	40

\*This category includes archives deposited by former Councillors and Mayors of Tower Hamlets.

So, one cataloguer for 3 years (36 months) should clear 34% of the backlog. Collections would be prioritised for cataloguing based on their perceived usefulness to researchers. There are two core-funded archivists on the staff who will be cataloguing during this period too. If they can be freed up entirely from all other duties (see below), according to the calculations above 100% of the backlog should be cleared. However it should be noted that the library will continue to accrue new collections, so the backlog extent is never fixed. The relocation from Mulberry Place to the new Civic Centre will likely generate a large bulk of LBTH deposits as offices are cleared.

- 2) We therefore also seek to fund two additional full-time permanent members of staff – one Heritage Assistant (Sc 6) - to work exclusively on public enquiry duty, and one annual Heritage Traineeship (Sc 5) who would work towards a Level 5 Diploma in Cultural Heritage, focussing on cataloguing as well as customer service. The creation of these cheaper posts would enable the core-funded archivists to focus on cataloguing during this three year period (and going forward), and would mitigate against the likelihood of the backlog building up again in future.
- 3) We also seek to acquire a conservation budget of £12k pa ex VAT, so as to fund the ongoing purchase of acid-free folders, boxes, tape and so on, into which deposited collections can be repackaged. There has never been a specific budget formally identified for this core archival function, and procurement is currently done on an ad hoc basis.

### Budgeted Outcomes/ Accountability (Focus on Improved performance)

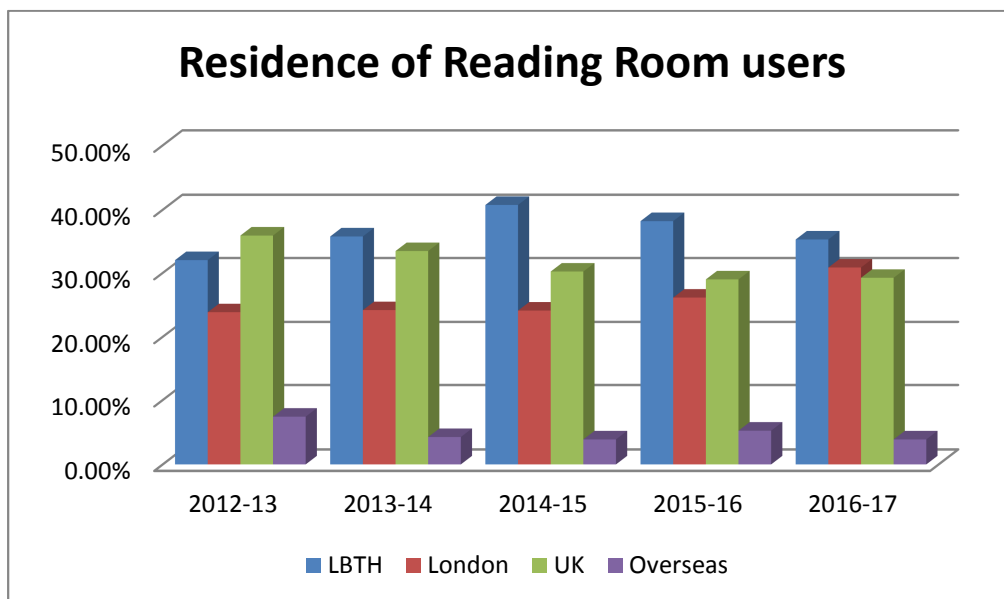
When residents engage with the heritage of Tower Hamlets using the unique, primary sources held at the library, whether through individual research, a group visit or an exhibition, many different strategic priorities are met, the key ones being "Creating and maintaining a vibrant and successful place" AND "Respect, value and celebrate our cultural history and diversity". It has been documented by studies in the archival education sector that employability, educational attainment, mental and emotional wellbeing and developing a sense of belonging – which of course leads to greater community cohesion - are boosted by engaging, even informally, with the history of one's neighbourhood, ancestral roots, and affiliated community or ethnic group.

If the documents currently obscured in the cataloguing backlog can be revealed and made publicly accessible, this will in turn lead to substantially more research visits by residents and other members of the public. It will also provide additional materials for use during the school and community workshops and exhibitions that are regularly held. Furthermore, we receive many requests annually from LBTH officers seeking legacy information about the council's actions during the 1980s and 1990s – these would be far more easily met with the relevant council papers catalogued and searchable online.

The annual CIPFA survey of Local Government Archives indicates that our backlog is the one of the largest of all the London boroughs. It should be noted that based on experience to date, external funding for cataloguing records which have been deposited by the parent authority is not available from the Heritage Lottery Fund who consider this to be part of our 'business as usual'. As the council goes about considering the options for expanding the storage facilities onsite at Bancroft Road, or perhaps via a relocation, to have access to and knowledge of the full extent of the collections held will only help build a positive corporate reputation as a council which properly values its principal

heritage asset in a borough world famous for its fascinating history.

The library is a vital resource for Tower Hamlets' heritage tourism offer – a visitor attraction which hosts regular free exhibitions and events on a wide variety of different aspects of East End history, ensuring many repeat visits. The market or audience for East End history is booming – it is a constant inspiration for exhibitions, books, websites, films, tv programmes and daily walking tours, but due to a lack of marketing resource (and arguably its location), the library is not as well-known as it should be. However, despite a relatively low profile, the quality of the service and the offer is extremely well-regarded by all who experience it, with positive feedback and emails of thanks and praise coming in regularly from all over the world. The exhibitions and events held have attracted coverage on ITV and BBC London News in recent years, and visitors travel across the country and from overseas to carry out their own personal research in the reading room, as the chart below shows.



The 2016 archive visitor satisfaction survey gave the library a result of 93%, above the national average. These levels of attendance and satisfaction will only improve with the greater resourcing proposed in this bid.

Finally, recruitment to the new annual Heritage Traineeship will be targeted at borough residents wishing to develop a career in the heritage sector. It will support the corporate objective of Improve educational aspiration and attainment especially from low-income families, as the Level 5 qualification does not require an expensive first degree, unlike the Archives & Records Management postgraduate course. A graduate traineeship would exclude many borough residents, so a diploma is felt to be the most appropriate way of ensuring take-up. We will investigate structuring the traineeship so as to be specifically for BAME residents or BAME young people, as it is important, particularly in Tower Hamlets, to ensure the heritage sector has a workforce to reflect the community it serves.

### Risks & Implications

Not to fund this project is to neglect a serious management control issue identified by Internal Audit, now addressed by Audit Committee. If this bid is not accepted it is likely that the service offer will have to be redesigned, leading to a significant reduction in opening hours and the offer to the public. In 2008-9 a large public campaign in favour of the preservation of the library service resulted in substantial and widespread outcry against the council by local residents as well as in national media.

The length of the backlog – dating in many cases from the late 1980s – demonstrates that despite the best will and efforts of staff, it is simply not possible to address this issue without additional capacity. Due to the specialist nature of the work as well as data protection legislation, cataloguing is a job for which archivists undertake a postgraduate qualification, and cannot be left to volunteers.

Going forward, the biggest challenge for the continued acquisition of archives by the service is the requirement to develop a digital archive system which will manage recent and contemporary records created and accessed digitally - never printed. Such a system needs to be designed and maintained with the objective of ensuring the *permanent preservation* of its contents, and navigate the risks posed by the rapid pace of technological obsolescence. The two new posts focussed on customer service will ensure that the library's existing core professional staff are freed up to address this important stepchange in due course.

### Value for Money & Efficiency

Cataloguing is a one-time-only task – it has a permanent legacy. Reference numbers which are in regular use today were assigned to items during cataloguing that took place fifty years ago or more. Once described, numbered and repackaged, all items catalogued during this project will remain permanently accessible with no further work anticipated.

As mentioned above, the increase in available stock is expected to lead to an increase in usage, but it is very hard to forecast this. Furthermore, the greater the number of visits the library receives, the greater the audience for the sale of items such as digital image scans, history books, reproduction maps, and so on.

This table shows how, though there were fewer onsite visitors to the reading room during the last financial year (as the ceiling in the reading room collapsed and for ten months only a limited service could be offered), there were benefits to diverting staff capacity to collection management. More items were catalogued by staff during this 'downtime', and more income was generated from booksales of duplicate stock.

<b>Totals</b>	<b>April 2015-March 2016</b>	<b>April 2016-March 2017</b>
Number of visits	4041	4017
Number of enquiries	2263	2355
Records added to online catalogue	2967	4445
Productions*	6830	5531
Income generated	£10,268	£11,617

\* A production is when someone requests to see an item, and staff locate it on the shelves and produce it for them to look at.

The following performance indicators will be monitored before, during and after to measure impact:

- Number of visits by the public
- Number of records added to catalogue
- Number of productions
- Number of hits on online catalogue
- Income generated

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Transitional Support to Manage Housing Benefit Admin Grant Reductions
<b>Reference</b>	GRO/ RES 02 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Lead Member</b>	Councillor David Edgar
<b>Directorate</b>	Resources
<b>Service Area</b>	Housing Benefit
<b>Lead Officer</b>	Steve Hill

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	4,920			
Other Costs	1,447			
Income	(3,698)	500	(200)	(300)
Reserves				
<b>Total</b>	2,669	500	(200)	(300)

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	105	See note below*	See note below*	See note below*

Description & Justification
<p>The Authority has a statutory obligation to administer Housing Benefit (HB).The Government provides Authorities with a Benefits Administration Subsidy Grant, to assist the Authority in the cost of administration of HB claims. The level of award is allocated to each Authority by applying a complex weighting and analysis of caseload. Although caseloads are the most significant driver behind the DWP's allocation of HB Admin Subsidy the impact of the roll out of Universal Credit (UC) will also influence activity levels and trends .</p> <p>Details of Tower Hamlets caseloads in recent years are shown as follows:</p> <p>2014/2015: Benefits caseload - 36,021            2015/2016: Benefits caseload - 35,377            2016/2017: Benefits caseload - 34,403            2017/2018: Current caseload - 32,045 ( to end of September 2017)</p> <p>The Benefits Service estimates a shortfall of £500k and £300k for each respective year 2018/19 and 2019/20.</p>



### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

The Benefits Service will continue to protect the level of subsidy by preventing overpayments (which incur Subsidy loss) and minimising error, whilst processing claims promptly, achieving the best possible outcomes for all our service users. This approach maximises income to the Authority while providing a responsive Benefits service for residents.

The Service is on target to deliver savings of £450k for this year, the Benefits Service has Service reviews planned to deliver savings of £525k p.a. for each of the next two years. A planned analysis of caseload and work being generated by Universal Credit will be undertaken, this will also take into account the roll out of Universal Credit and whether the DWP are meeting their "migration" targets; this work will determine the actual reduction in staffing numbers.

### **Risks & Implications**

Benefits claims must be processed in strict accordance with the Housing Benefit Regulations 2006.

Failure to process Benefits Claims promptly and correctly can result in significant reductions in income through Benefits Subsidy penalties.

For 2016/17 Tower Hamlets Annual Benefits Subsidy claim was £268m. Given the size of the Annual Benefits Subsidy Claim, every effort must be made by the Authority to minimise the risk of delays in processing claims, overpayments and errors in calculations as a result of the penalties and loss of subsidy applied to such errors. In order to achieve this, Benefits Service administration requires adequate resources to remain up to date, well trained and responsive. This expenditure would be categorised as inescapable growth, as ultimately these resulting changes in resources are driven by the DWP and DCLG.

In broad terms the DWP's change in stance on the levels of admin subsidy that will be paid to Local Authorities will be significantly affected by the level of unemployment and impact of UC. Due consideration will also need to be given to the influence of fiscal measures, which will impact on the wider economy in coming months and years.

Recent trends suggest that Benefits caseloads are in decline so it would be practical to allow a transitional period to reform the service sufficiently and allow for the introduction of UC and a Benefit Service which is fit for future purpose and able to respond to future levels of uncertainty and any statutory obligation.

The DWP appears to be assuming a reduction in caseloads and unemployment at this time. It would therefore be prudent to allow for a growth bid of £800k over the next two full financial years considering future requirements.

At this time the service remains on target to deliver £1.5m savings over the next three years.

### **Value for Money & Efficiency**

The growth bid represents the additional burden placed on the General Fund through the recent changes applied to the distribution of Local Authority Housing Benefit Admin Grant.

The Benefits Service is already working on strategic decisions over the coming months and years to ensure the final contribution of the Authority will be kept to a minimum whilst not compromising service delivery and integrity of the Authority's Subsidy claims.

<b>Growth Type</b>	Budget Pressures
<b>Title</b>	Idea Stores Books & Materials Stock Fund
<b>Reference</b>	GRO/ RES 03 / 18-19
<b>Strategic Priority Area</b>	1.4 Inequality is reduced and people live in a cohesive community
<b>Lead Member</b>	David Edgar
<b>Directorate</b>	Resources
<b>Service Area</b>	Idea Store
<b>Lead Officer</b>	

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs	340	80		
Income				
Reserves				
<b>Total</b>	340	80		

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification
<p><b>Information should include a brief description of the growth requirement; evidence of numbers; cost drivers; impact on outcomes; reasons such as changes in legislation etc</b></p> <p>Several years' below average spending on materials has seen a gradual depletion of the range and quality of stock available to local people. The materials fund which in 2008-9 stood at £3.48 per head of population by 2017-18 had reduced to £1.11 per capita. Taking into account book price inflation the stock fund in 2017 will buy 1 book for every 9 residents compared to one for every 3 in 2008.</p> <p>In the longer term funding for materials will be reviewed as a strong collection of books and other library materials is key to maintaining the high usage of the Idea Stores.</p> <p>The current bid will be the first step in improving the quality and range of provision and will be concentrated on a specific allowing for measurement of impact. It will be targeted at redressing the weakness in the Idea Store provision of books that support health and healthy lifestyles and will allow Tower Hamlets to deliver, for the first time, the Society of Chief Librarians' Universal Offer on Health.</p> <p>The bid will allow for the acquisition of the national Reading Well Books on Prescription collections of books for all five Idea Stores and for increased provision of health related books, including healthy eating and fitness.</p> <p>This increase will be a relatively low cost but highly effective contribution to outcomes across a range of council services in particular 'A healthy and supportive community'</p> <p>The Reading Well Books on Prescription scheme is delivered by The Reading Agency in partnership with the Society of Chief Librarians as part of the Society of Chief Librarians' Universal Health Offer. It is supported by Arts Council England and Wellcome.</p> <p>The programme is supported by a wide range of professional health bodies including Public Health England, NHS</p>

England and The Royal College of GPs.

The collections are all endorsed by health experts, as well as people with living with the conditions covered and their relatives and carers. There is potential to work with health professional who are can recommend titles to support their patients. Alternatively people can visit Idea Stores and select the books without an intervention.

There are currently Reading Well available: Reading Well Books on Prescription for common mental health conditions

- Reading Well Books on Prescription for dementia
- Reading Well for young people
- Reading Well for long term conditions
- 

National Books on Prescription schemes and other collections of health related books support good health, particularly good mental health.

### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

**Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance**

Provision of a high quality and wide ranging library collection means that Idea Stores are able to contribute to a number of the council's strategic priorities. The collection supports the work done elsewhere in Idea Store, including Idea Store Learning, in particular:

'A healthy and supportive community'

Provision of materials on health, including healthy eating, smoking cessation, exercise as well as information on particular conditions and mental health. Growth in the materials fund will enable a refresh of the collection and participation in national 'Books on Prescription' schemes that use books to support the management on long term conditions.

### **Risks & Implications**

**Highlight Service/ Corporate associated;**

Reading Well Books on Prescription is a national programme. Participation is a commitment required as part of the society of Chief Librarians' Universal Offers for Libraries and is endorsed by the Department of Culture Media and Sport and Arts Council England.

Inability to acquire associated materials would jeopardise Tower Hamlets' ability to participate in this national offer.

### **Value for Money & Efficiency**

Provide justification for VFM & Efficiency

The following performance indicators will be monitored before, during and after to measure impact:

- In house survey of Idea Store Customers
- Number of people during the Public Library User Survey (2018), stating that 'this library has helped me with my health'

Growth Bids - Additional Mayoral Priority Growth

Appendix 3B

Reference	Directorate	New or extension to 2020/21	Title	Strategic Priority Area	Lead Member	2018/19 £'000	2019/20 £'000	2020/21 £'000	TOTAL £'000
MPG/ CHI 01 / 18-19	Children's Services	New	Implementation of the Ethical Care Charter	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Amy Whitelock-Gibbs	109	-	-	109
MPG/ CHI 02 / 18-19	Children's Services	New	Early Years Provision Victoria Park and St Hilda's Community Centre	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Amy Whitelock-Gibbs	88	31	31	150
MPG/ CHI 03 / 18-19	Children's Services	Extension to 2020/21	Continuing to provide universal free school meals	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Amy Whitelock-Gibbs	250	-	2,000	2,250
			<b>Children's Services Total</b>			<b>447</b>	<b>31</b>	<b>2,031</b>	<b>2,509</b>
MPG/ HAC 01 / 18-19	Health, Adults and Community	New	Community Safety, ASB & Crime	2.3 People live in safer neighbourhoods and anti-social behaviour is tackled	Cllr Denise Jones	315	273	277	865
			<b>Health, Adult &amp; Community Total</b>			<b>315</b>	<b>273</b>	<b>277</b>	<b>865</b>
MPG/ PLA 01 / 18-19	Place	New	Enabling Unemployed Parents to Move into Childcare Jobs	1.1 People access a range of education, training, and employment opportunities and feel they share the benefits from growth	Cllr Joshua Peck	450	451	451	1,352
MPG/ PLA 02 / 18-19	Place	New	Watney Market Shop Front for 'Young WorkPath'	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Cllr Joshua Peck	60	60	60	180
MPG/ PLA 03 / 18-19	Place	New	Private Tenants Charter	2.2 People live in good quality and affordable homes and neighbourhoods	Cllr Sirajul Islam	100	-	-	100
MPG/ PLA 04 / 18-19	Place	New	Air Quality Assistant	2.1 People live in a borough that is clean and green	Cllr Rachel Blake	71	50	50	171
MPG/ PLA 05 / 18-19	Place	New	Bursary for Environmental Health Trainees	2.1 People live in a borough that is clean and green	Cllr Amina Ali	30	30	30	90
MPG/ PLA 06 / 18-19	Place	New	ASB & Crime Neighbourhood Management	2.3 People live in safer neighbourhoods and anti-social behaviour is tackled	Cllr Asma Begum	145	200	200	545
			<b>Place Total</b>			<b>856</b>	<b>791</b>	<b>791</b>	<b>2,438</b>
MGRO RES 2-17	Resources	Extension to 2020/21	Tackling Poverty Fund - Tackling poverty in Tower Hamlets by creating a Welfare Support Scheme to support residents	1.3 People access joined-up services when they need them and feel healthier and independent	Cllr David Edgar	-	-	1,667	1,667
			<b>Resources Total</b>			<b>-</b>	<b>-</b>	<b>1,667</b>	<b>1,667</b>
			<b>TOTAL</b>			<b>1,618</b>	<b>1,094</b>	<b>4,766</b>	<b>7,479</b>

<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	Implementation of the Ethical Care Charter
<b>Reference</b>	MPG/ CHI 01 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	Cllr Amy Whitelock-Gibbs
<b>Directorate</b>	Children's Services
<b>Service Area</b>	Children's Social Care
<b>Lead Officer</b>	Sandra Reddie

Financial Information	Budget Allocation		Growth Bid	
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs	311.156	108.934		
Income				
Reserves				
Capital				
HRA				
<b>Total</b>	311.156	108.934		

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

Description & Justification
<p>Recurring growth bid for £108.934k from the Mayoral Priority fund for the Implementation of the Ethical Care Charter-description and rationale as indicated below</p> <p>The Council recently tendered its personal care services for children with a disability and adult domiciliary care through a number of framework agreements with external care providers. The Mayor signed up to the Ethical Care Charter which requires external providers to sign up to a number of requirements associated with the Charter.</p> <p>All of our commissioned external providers previously adhered to one or more of the requirements at each stage of the Charter:</p> <ul style="list-style-type: none"> <li>• Commissioning of visits to customers is determined by their needs and not minutes or tasks;</li> <li>• 15 minute calls are not used routinely;</li> <li>• Visits will not be scheduled so that homecare workers are forced to rush;</li> <li>• Statutory sick pay will be paid to those eligible.</li> <li>• Customers will be allocated the same homecare worker where possible</li> <li>• Zero hours contracts will not replace permanent contracts</li> <li>• Providers have a procedure to follow-up concerns about customer wellbeing</li> <li>• Homecare workers will be regularly trained</li> <li>• All homecare workers will be paid at least the living wage;</li> <li>• All homecare workers will be covered by an occupational sick pay scheme</li> </ul> <p>Stage 1 also requires that homecare workers will be paid for their travel time and travel costs. Stage 2 requires that training time and time for homecare workers to meet regularly (such as at team meetings) should be provided in work time and at no cost to the worker. Not all of our providers are signed up to these requirements and the cost to the</p>

provider in doing so has been passed on to us as commissioners.

### **Cost Implications:**

Currently, we commission 1,700 hours of personal care from our external providers per month. We have two providers on the Children's Personal Care Framework and prices increased as a result of the requirement of providers to adhere to the requirements of the Ethical Care Charter, in particular relating to travel costs. Based on current spend we anticipate the increase in spend will be in the region of £64,650

Provider 1– costs increased from £15.20 to £19.15 per hour. £19.15 x 1,500 hours per month x 12 is £344,700. Previously was £273,600 = a difference of £71,100.

Provider 2 - increased in costs of previous provider from £13.25 to £15.50 x 200 hours per week. £37,200 per annum. Previously £31,800 = a difference of £5,400.

**Total difference = £76,500**

We are also expecting an increase in demand for services and have factored in a 10% annual increase to account for this. The requested growth bid is therefore £108,934.

### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance

- Ensure Local authority's statutory obligations under the Children Act 1989 to provide services for children and young people with a disability
- Ensure Local Authority is compliant and prepared for SEND inspections which are imminent
- Ensure children with disabilities have equal opportunities to enjoy and achieve as their non-disabled peers

### **Risks & Implications**

Highlight Service/ Corporate associated;

- Ability to be able to meet our statutory duty to support children and young people with SEND.
- Risk of challenge as a result of the above.

### **Value for Money & Efficiency**

There was a robust tender exercise for the provision of personal care for disabled children which included bidders demonstrating they were able to meet the requirements of the Ethical Care Charter and also that they would offer value for money for the services provided. The preferred providers were selected on this basis.

<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	Early Years Provision Victoria Park and St Hilda's Community Centre
<b>Reference</b>	MPG / CHI 002 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and Young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	Amy Whitelock Gibbs
<b>Directorate</b>	Children's Services
<b>Service Area</b>	Education and Partnerships
<b>Lead Officer</b>	Christine McInnes

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs		88	31	31
Income				
To Reserves				
Capital		50*		
HRA				
<b>Total</b>		138*	31	31

\*The site needs to be refurbished to comply with DDA requirements. It also needs a new kitchen. The costs are yet to be finalised although the £50K quoted is an estimate of the potential capital investment required based on previous work commissioned.

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)				

### Description & Justification

This growth bid is for an adjustment to the budget for 3 consecutive years

At the Cabinet meeting on 10 January 2017, the Mayor announced additional funding for early years' services to enable commissioning to support the children's centre offer. This enabled early years' services be supported, including those offered from St. Hilda's and Victoria Park. We anticipate that early years' services at Victoria Park (associated with Overland Children's Centre) and St. Hilda's (associated with Mowlem Children's Centre) will continue on the basis of this bid.

Continuation of services at Victoria Park will require some refurbishment / development works to make the building suitable for the delivery of early years' provision. This is likely to require a temporary suspension of service to allow works to proceed.

The St Hilda's site and service offer is extremely popular with local families. This is because the nearest children's centre, Mowlem Children's Centre, is a 20min bus journey away. The loss of services from this outreach site would result in a significant drop in the overall reach of Mowlem Children's Centre.

Residents would welcome the continued provision of services from the Victoria Park site as they are concerned that early years' services will cease once the site at Olga is up and running. To continue to run services from Victoria Park and St Hilda's, additional resources would be required as outlined in this growth bid.

### Budgeted Outcomes/ Accountability (Focus on Improved performance)

Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance

The additional service would meet the LA strategic objectives:

1. Children get the best start in life and young people realise their potential
2. Gaps in inequality have reduced and diversity is embraced

The Victoria Park site provides additional services for families, on the border with LB Hackney. This brings the challenge of ensuring that the families who use services are from LBTH.

**April-October**

Total Number unique families using Victoria Park	349
Total number of unique families from Hackney	45
Total number of unique families from Tower Hamlets	304

St. Hilda's Site - April-October

	Adult Reach	Adult Volume	Child Reach	Child Volume
Number of individuals	162	487	183	647

**Risks & Implications**

Highlight Service/ Corporate associated;

Victoria Park Site -

The risk associated would be that potentially 304 families, from Tower Hamlets would not engage in the new site at Olga which is approximately 10mins walking distance from Victoria Park. This is a low risk as the new site has new the facilities and increased capacity for each session (to up to 30 people at any one time). This will mean that more services for a greater number of families will be provided.

St. Hilda's Site –

The risk is that we would lose the engagement of 183 children and 162 parents, resulting in our early identification work from Mowlem becoming more difficult.

**Value for Money & Efficiency**

Provide justification for VFM & Efficiency

Provision at these sites will ensure that families who might not otherwise engage with early education or take up early help are able to engage with these services. We are aware that should families not take up help early, problems can easily escalate becoming more serious, more difficult to address and more expensive. Research indicates that for every £1 of early intervention 0-4, £8 is saved in relation to more specialist services required at a later point.



<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	Continuing to provide universal free school meals
<b>Reference</b>	MPG/ CHI 03 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	Amy Whitelock-Gibb
<b>Directorate</b>	Children's Directorate
<b>Service Area</b>	Youth and Commissioning
<b>Lead Officer</b>	Ronke Martins-Taylor

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs		250		2,000
Income				
To Reserves				
Capital				
HRA				
<b>Total</b>		250		2,000

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	N/a	N/a	N/a	N/a

Description & Justification				
<p>It is a continued Mayoral priority to provide universal free school meals to primary school age children. Sums of £2m per year for 2018-19 and 2019-20 were approved in February 2017 as part of the budget process and are included in the Council MTFs. This bid supports continuation of the offer and sets aside a further £2m in 2020-21.</p> <p>In addition to this, the current Mayor's Free School Meal arrangements reimburse Primary Schools at a rate of £2.30 per meal. For 2018/19 a price increase has been proposed which will see the price of a Primary School meal increase as set out in the table below:</p> <table border="1" data-bbox="183 1534 1252 1612"> <thead> <tr> <th>Proposed 2018/19 prices</th> <th>Primary school meal price</th> </tr> </thead> <tbody> <tr> <td>The price per meal that the school is invoiced at</td> <td>£2.45</td> </tr> </tbody> </table> <p>It is possible that Primary Schools could pass this price increase to parents thus negating the Mayoral Free School Meal programme. This growth bid will cover the 15p per meal price increase, over and above £2.30, and will enable the Mayor to continue to provide his free school meals programme.</p> <p>The growth bid for 2018/19 will cover the period April 2018 to August 2018 which will enable the Mayor and Primary School representatives' sufficient time to come to some agreement about future school price increases.</p>	Proposed 2018/19 prices	Primary school meal price	The price per meal that the school is invoiced at	£2.45
Proposed 2018/19 prices	Primary school meal price			
The price per meal that the school is invoiced at	£2.45			

**Budgeted Outcomes/ Accountability (Focus on Improved performance)**

**Priority - More people living healthily and independently for longer:**

- Free school meals are associated with improved education, social and health benefits,
- There is a take up of 96% in of the Mayor's Free School Meal programme in all relevant schools
- Reduction in childhood obesity as children have access to a nutritious, healthy school meal

**Risks & Implications**

- If the proposed price increase to the Mayor's Free School Meal programme is not covered by this growth bid then there is a risk that schools will charge parents for school meals potentially negating the programme.

**Value for Money & Efficiency**

- This growth bid represents value for money given the continued provision of the Mayor's Free School Meal programme.

<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	Community Safety, ASB & Crime
<b>Reference</b>	MPG / HAC 01 / 18-19
<b>Strategic Priority Area</b>	Less crime and antisocial behaviour, Young people realising their potential, An improved environment
<b>Lead Member</b>	Cllr Asma Begum
<b>Directorate</b>	Health Adults & Communities
<b>Service Area</b>	Community Safety
<b>Lead Officer</b>	Ann Corbett

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs		240.416	245.133	249.936
Other Costs		75	27.5	27.5
Income				
To Reserves				
Capital				
HRA				
<b>Total</b>		315.416	272.633	277.436

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)		4	4	4

Description & Justification
<p>This investment aims to address community concerns relating to community safety, including acid attacks, drugs and gangs, ensure that we are appropriately resourced to fulfil our duties to Protect under the national CONTEST Strategy, tackle ASB, crime and serious organised crime (including drug markets) in the borough. This will also allow us to move to "future proof" the Borough against the cumulative impacts of a 30% top slice (reduction) in Mayor's Officer for Policing and Crime (MOPAC) borough allocation under the London Crime Prevention Fund, which is due to reduce from £947,123 p.a. to £662,986 for the years 2018/19, 2019/20 and 2020/21.</p> <p>Crime, particularly violent crime and anti-social behaviour (ASB) continue to be a primary concern for the Mayor, Councillors and residents in the Borough. Tackling crime and ASB is one of the Mayor's key priorities. The Borough has the highest volume of ASB (101 and 999) calls across London boroughs and some forms of violent crime (e.g. domestic abuse and knife crime) are unacceptably high. The Borough also receives the highest number of drugs and alcohol related ASB and crime complaints in comparison to similar east London boroughs.</p> <p>The Mayor in Cabinet has recently committed over £3.3 million to fund 39 police officers over the coming 3 years, to future proof local policing in our neighbourhoods in the face of £400 million Metropolitan Police required savings. These new officers will respond to the communities' highest concerns of ASB, drugs, prostitution and tackling issues in neighbourhoods.</p> <p>The current community safety function in the council has many pressures and demands. The historical legacy of the use of grant funding for projects and posts has led to a lack of sustainability and flexibility in</p>

the current model. The transfer of community safety into HA&C has proved successful as a number of safeguarding service synergies have already delivered improvements e.g. the community Multi-Agency Risk Assessment Case-conference to support vulnerable victims of anti-social behaviour. The current function as it stands delivers well on specialist areas Violence Against Women and Girls, PREVENT, Hate Crime all of which align to the borough strategic priorities.

However these programmes and services do not deliver on the priority to tackle ASB, reduce weapon enabled violence, PROTECT /counter-terrorism agenda and new expectations and emerging threats from serious organised crime (SOC). Our current capacity to address SOC is a key borough risk and links to the scale, nature and threat posed by organised criminal networks to children and vulnerable communities e.g. the operation of street based drugs markets.

The Civil Protection Unit, also under community safety (x2 fte), lacks the resilience to deliver on increasing expectations post the Grenfell Tower tragedy and the current UK threat level for terrorist attack.

Given the increasing demands and pressures and the high profile of the community safety agenda there would be clear value to be gained and corporate risks mitigated in demonstrating that the Council is further committed to sustaining the gains achieved through the ASB review and the significant investment in additional policing.

### Recommendations

- Develop new strategic approach to tackling Serious Organised Crime and new service model supported by SOC profiling/mapping, to seize opportunities aligned to the new proposal that the Met police will roll out dedicated SOC advisors in each borough. Also to support the corporate priority to improve children services and protect children at risk of exploitation.
- Provide an A&E based Gangs and Public Safety Co-ordinator to safeguard victims of violent crime (inc. stabbings and use of corrosive substances) to establish levels of risk, provide practical support and advice for victims of gang associated violence, exit strategies for those involved and share information with appropriate partner agencies to improve our co-ordinated partnership response
- Develop enhanced strategic expertise in the current service to provide expert advice on ASB and crime internally within the council and externally to partners.
- Enhance the resilience of the Civil Protection Unit and aim to provide a gold service standard.
- Enhance expertise and develop a coherent programme of protective security measures and activity to PROTECT the borough from terrorist attack.

<b>Community Safety, ASB &amp; Crime growth bid</b>	<b>2018-19 Year 1</b>	<b>2019-20 Year 2</b>	<b>2020-21 Year 3</b>
<u>Civil Protection Unit:</u>			
Protect* Programme Manager	66,000	67,320	68,666
Civil Contingencies Officer	59,000	60,180	61,384
Borough Civil Protection IT System Purchase (Year 1 only)	47,500		
Annual Licence	27,500	27,500	27,500
Emergency Planning Training Programme	5,000	5,000	5,000
<u>Community Safety Outreach Team:</u>			
A&E Gangs and Public Safety Project	49,377	50,365	51,372
<u>Serious Organised Crime (S.O.C):</u>			
SOC Project	61,048	62,269	63,514

<b>Community Safety, ASB &amp; Crime growth bid: Year 1-3 total</b>	<b>315,416</b>	<b>272,633</b>	<b>277,436</b>
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\*Protect – Building resilience to counter terrorism

Please note - Above salary figures include 0.5% Apprentice Levy and estimated 2% pay increase for all posts. Civil Protection posts include Emergency Call-Out allowance.

### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

The Tower Hamlets Council Strategic Plan 2016-19 identifies 'People feel safe and places have less crime and ASB' as one of the desired outcomes. It will be achieved only when all the partners work together with sufficient resources. These crucial areas of growth to the Council will enable us to effectively co-ordinate partnership responses to priority community safety concerns, emerging trends and key duties/responsibilities.

Aligns to the strategic priorities

- Less crime and ASB
- Young people realising their potential
- An improved environment

Crime continues to be the second highest priority for Tower Hamlets residents. Nationally all crime is on the increase. Although the crime profile for the Borough has seen some reductions in traditional volume crime – the borough still has the highest level of ASB demand in London, Violence is still unacceptably high. Tower Hamlets is in the top 5 London boroughs in relation to knife crime with injury under 25yrs.

The Borough is aware of community concerns regarding street based drug markets, street prostitution and issues with street level gangs involved in violence and criminality. Organised crime networks operate differently and may be involved in the supply and distribution of drugs, modern slavery, facilitate child sexual exploitation and others bridge the gap between terrorism and organised criminality. The profile and prevalence of SOC differs greatly from area to area. We have an urgent need to understand our unique local vulnerabilities to serious and organised crime and address them through multi agency action plans whilst at the same time safeguarding children and those most vulnerable to exploitation.

#### **Outcomes**

Crime and ASB reduces

Children and vulnerable communities are protected from exploitation by Organised Criminal Gangs

Improved feelings of safety and health and well- being.

Improved borough resilience

### Risks & Implications

Highlight Service/ Corporate associated;

- Crime & ASB goes up.
- Resident dissatisfaction increases & Increasing complaints in relation to ASB and crime to the council
- Perceptions and feelings of safety
- The council is unable to fulfil its statutory duties in line with the Civil Contingencies Act
- This proposal will help reduce the Council's reputational risks. It aims to address community concerns relating to community safety in the Borough which currently has the highest volume of ASB (101 and 999) calls across London boroughs. Action to tackle these problems will reassure the residents.

### Value for Money & Efficiency

The cost to the public purse in relation to crime and ASB is significant, in total there were 32,084 crimes in the borough (Total Notifiable Offences) over the 12 months up to and including 5<sup>th</sup> October 2017, this is up 5.4% on the previous 12 month period. The Home Office most recently updated their Cost of Crime Calculator in 2010 with the cost per crime varying considerably within that, ranging from murders estimated at costing £1,774,681 and shoplifting costing £124 each.

Recorded Offences	Number of incidents in Tower Hamlets	Unit costs	Total estimated costs (year up to 5 Oct 2017)
Criminal damage	2,443	£1,053	£2,572,479
Knife injury victims (U25 non DA)	107	£25,747	£2,754,929
Robbery personal property	1,410	£8,810	£12,422,100

#### Sources

MPS daily dashboard report period ending 5 October 2017

"Revisions made to the multipliers an unit costs of crime used in the Integrated Offender Management Value for Money Toolkit"

(<https://www.whatdotheyknow.com/request/163974/response/411544/attach/4/Further%20information.pdf>)

<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	Enabling Unemployed Parents to Move into Childcare Jobs
<b>Reference</b>	MPG / PLA 01 / 18-19
<b>Strategic Priority Area</b>	1.1 People access a range of education, training, and employment opportunities and feel they share the benefits from growth
<b>Lead Member</b>	Cllr. Josh Peck, Cabinet Member for Work & Economic Development
<b>Directorate</b>	Place
<b>Service Area</b>	Growth & Economic Development
<b>Lead Officer</b>	Andy Scott

Financial Information	Budget Allocation		Growth Bid	
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	7	44	45	45
Other Costs	5	406	406	406
Income*				
Reserves				
Capital				
HRA				
<b>Total</b>	12	450	451	451

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	1	1	1	1

\*Apprenticeship Levy

Description & Justification
<p>This bid seeks to increase the number of Level 2 skilled childcare workers and upskill at least the same number of existing childcare workers. It has been re-submitted from February 2017, taking into account the implementation of the government's new Apprenticeship Levy. The proposal is to provide, over the lifetime of the project:</p> <ul style="list-style-type: none"> <li>60 new Level 2 Apprentice childcare roles</li> <li>A minimum of 60 up-skilled to Level 3 and above childcare workers</li> </ul> <p>The above costs are based upon the following assumptions:</p> <ul style="list-style-type: none"> <li>1 x PO3 delivery post (£44k including on-costs) to be recruited in the financial year 2017/18</li> <li>Recruitment and project marketing costs for the above at £5k per annum</li> <li>DBS checks for participants at £44.00 per client. 25 per annum have been allowed for on the basis that some will highlight difficulties that disqualify them from working with children. Existing staff to be upskilled will have been DBS checked but a small number may require and updated check.</li> <li>Apprentice salaries and on-costs for 20 per annum at £20k per client.</li> <li>All training costs to be covered by LBTH Levy or for upskilled staff, their own organisation's Levy allowance.</li> </ul> <p>Affordable childcare is recognised as being a major barrier to employment for many local residents. Welfare reform is having a profound impact on residents in the borough, as are funding cuts to educational school-based nurseries. Lone parent households are one of the groups most affected early findings indicate that future changes to childcare through the proposed 30hrs central government scheme will further compound the difficulties for these households.</p> <p>Two thirds of mothers (66%) reported that they were in employment; around 53% of non-working mothers agreed they would go to work if they could arrange good quality childcare which was convenient, reliable and affordable.</p>

Estimates are that around 40,000 LBTH residents are economically inactive, of which 70% are women.

This project seeks to address in a small measure both supply and demand side need for quality childcare workers. A member of staff will be employed in the financial year 2017/18 in order to further develop the initiative and work with Legal and Procurement on the process for assigning placements.

#### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

Align with the council's strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance

- 60 new Level 2 Apprentice childcare roles - LBTH employed
- A minimum of 60 childcare workers up-skilled to Level 3 or above

A requirement of each placement will be a commitment from the provider to upskill at least one existing member of staff, and one of the key promotional themes of this programme will be the incentive for providers that by hosting an LBTH Level2 Apprentice they will mitigate the impact of the 20% study leave required by their existing staff during their up-skilling training.

This programme will increase the number of internal apprenticeships supported by LBTH and help to maximise the use of the Apprenticeship Levy funds, with training costs of up to 6k per learner for the 60 LBTH apprentices being paid out of the levy. The programme will further increase the number of apprenticeships, albeit by upskilling existing workers, under the Mayors "1000 apprenticeships" pledge.

Placements will be monitored to ensure effective relevant work planning and pastoral care provision. Training will be quality controlled through the processes laid down in the Digital Account management.

#### **Risks & Implications**

Highlight Service/ Corporate associated;

- Lack of take up by clients – mitigated by effective marketing campaign and joint work with Children's Centres and schools using the WorkPath delivery model.
- Lack of available placements – mitigated by joint work with Children's Services Early Years; outreach and engagement with provider; effective guidance and marketing materials.
- Delayed DBS checks – the system has moved to online digital and is now much quicker. One of the roles of the appointed staff member will be to constantly chase completion of DBS checks.

#### **Value for Money & Efficiency**

Provide justification for VFM & Efficiency

Assisting unemployed residents into work secures a number of key savings; include costs to the Exchequer in terms of benefit payments, costs to the Council in terms of Discretionary Housing Payment and potential rent arrears. The expenditure on this type of Intermediate Labour Market programme bridges the gap between LBTH subsidising unemployed residents and developing their self-reliance in work. Work is known to have a positive impact on health and well-being and will have associated savings to health and potentially future care services.

The programme will increase the number of internal apprenticeship supported by LBTH and help to maximise the use of the Apprenticeship Levy funds, with training costs of up to 6k per learner for the 60 LBTH apprentices. The programme will further increase the number of apprenticeships, albeit by Upskilling existing workers, under the Mayors "1000 apprenticeships" pledge.



<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	Watney Market Shop Front for 'Young WorkPath'
<b>Reference</b>	MPG/ PLA 02 / 18-19
<b>Strategic Priority Area</b>	1.2 Children and young people feel they are protected and get the best start in life and realise their potential
<b>Lead Member</b>	Cllr Josh Peck - Growth & Economic Development
<b>Directorate</b>	Place
<b>Service Area</b>	Growth & Economic Development (WorkPath/Employment)
<b>Lead Officer</b>	Andy Scott / Rachel Jenman

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs				
Other Costs		60 (Building costs))	60 (Building costs))	60 (Building costs))
Income				
Reserves				
Capital		300 (Fit out & Prep)		
HRA				
<b>Total</b>		360	60	60

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	1	No newly employed staff - Will fund current staff contingent to deliver coordinated service provision		

Description & Justification
<p>The bid is to fit out a shop front location in Watney Market and occupy it to deliver integrated employment and skills programmes. The premises will be used to house elements of Information advice and guidance service for the WorkPath programme.</p> <p>Specifically it is intended to align services geared toward Younger residents from this site including skill, training and apprenticeships delivery alongside housing the restructured Careers service which is expected to be transferred from Children's Services to the Growth &amp; Economic Development Division in Place Directorate in the new financial year.</p> <p>Capital funds are required to fit out the space to meet the needs of the service. Revenue costs are required for an officer to drive the service transfer and multiagency occupancy which intends to increase engagement of younger residents, liaise with schools and colleges, better publicise the range of training and job opportunities available and to maximise the progression of young people and NEET residents into training and jobs.</p> <p>Programmes to be provided from the unit will include:</p> <ul style="list-style-type: none"> <li>• Information Advice and Guidance through WorkPath;</li> <li>• Careers Services provision to vulnerable young people (Statutory obligation) ;</li> <li>• Progressions to apprenticeships;</li> <li>• Mayors Apprenticeship Programme – generating opportunity;</li> <li>• Pre-employment training including employability and interview preparation;</li> <li>• Construction preparation training including CSCS cards and Health and Safety;</li> <li>• Ad-hoc sector based training provision required by specific recruiting employers;</li> </ul> <p>Occupation of the premises will also form part of a developing programme of regeneration for Watney Market area and the WorkPath shop front will offer a stable kick-start to the area for footfall and inward investment.</p>

### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance

Over the three year period it is expected that the service will engage an additional 900 residents, generate 1000 apprenticeship opportunities (Mayor Programme) deliver 1200 IAG sessions and deliver 400 additional training outcomes.

The Facility will become a focal point for young people engagement on pathways to employment and apprenticeship; and the provision will adapt more quickly to changing labour market trends and opportunities.

The Careers service provision is currently housed in Bow Road but no longer has a current lease and therefore will need to be rehoused elsewhere. The premises offers shared and joined up facilities to both align Careers Services to the Employment and training programmes within WorkPath and also potentially halves the costs to the council in lease arrangements for Bow Road.

The governance of the programme will fit within WorkPath delivery and performance will be driven and monitored through the council performance management process under employment and opportunity indicators.

### **Risks & Implications**

Service risks

- Risk: Careers Service Restructure does not complete - Low

Implications (High) - Continued overspend in Children's services budget; delays in opportunity to transfer the team, loss of formalised joined up service provision;

Mitigated by continuous working in partnership

- Risk: Careers Services does not transfer to Place Directorate - Low

Implications (Medium) - Non-integrated service as outlined in the Careers Service restructure plan; Requirement to rehouse the Careers services are with Childrens Services budgets.

Mitigation – Employment teams can work in partnership with Careers Services but do not align all functions under Workpath

- Risk: Not Occupying shop premises – TBC

Implications (Medium) - Non alignment of service provision, does not provide focal point for young people and therefore cannot enhance engagement and outcomes, Does not meet the strategic objective of outreach provision for WorkPath programme; potential that this will delay increases in outputs and not maximise joined up functions. Loss of premises for Careers services to locate in resulting in restart of process to rehouse the services and increased costs to council budgets.

Mitigation – Explore alternative options for shop front or outreach provision, align Careers and employment services at a distance.

### **Value for Money & Efficiency**

Careers service is being restructured to not only bring the service back within its budget allocations, it is also taking account of the statutory services required going forward to vulnerable young people and the alignment of provision through the WorkPath programme in employment and skills. This will provide a cost effective and seamless pathway

from advice to young people through to accessing skills, training and employment opportunities.

The Careers restructure essentially stops a £350,000 overspend annually reduces the service costs to around half of their existing budget and offers a reduction in costs for current leased premises.

Alignment of the Careers Services alongside WorkPath will provide for an integrated service provision which can increase outcomes for skills and jobs across young people but also impacts positively on specific disadvantaged groups of NEET, Learning Difficulty, leaving care, Ethnic minorities, Women and disabilities (Physical & Mental).

<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	Private Tenants Charter
<b>Reference</b>	MPG/ PLA 03 / 18-19
<b>Strategic Priority Area</b>	2.2 People live in good quality and affordable homes and neighbourhoods
<b>Lead Member</b>	Cllr Sirajul Islam – Deputy Mayor
<b>Directorate</b>	Place
<b>Service Area</b>	Environmental Health and Trading Standards
<b>Lead Officer</b>	David Tolley

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	75	100	100	100
Other Costs				
Income				
Reserves				
Capital				
HRA				
<b>Total</b>	75	100	100	100

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	2	2	2	2

Description & Justification
<p>As part of the recent launch of the Tenants Charter by the Mayor and Deputy Mayor, it was recognised that there would be extra demand placed on Environmental Health and Trading Standards to address the complaints and undertake investigations/prosecutions against letting agents.</p> <p>As part of the launch the Mayor requested a further £75,000 to be allocated to the Service, in year, and an ongoing request for future funding to be considered.</p> <p>This additional funding for forthcoming years would be used to employ a Senior Trading Standards Officer and a Environmental Health Officer</p>

Budgeted Outcomes/ Accountability (Focus on Improved performance)
<p>Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance</p> <p>Develop a Tenants Charter and Deliver statutory responsibilities in relation to investigations and enforcement actions to tackle bad conditions in the Private Rented Sector – these are milestones in the Strategic Plan.</p> <p>The employment of additional staff will meet this increase in demand for the Service area. The provision of these posts will enable the Charter to be regulated and miscreants brought in line.</p>

### **Risks & Implications**

Highlight Service/ Corporate associated;

The Service would be unlikely to meet the extra demands placed on it through the Tenants Charter – the risk would be that public expectations would be raised and then not met. We would caution against raising the profile of the Charter as it would not be underpinned with enforcement.

### **Value for Money & Efficiency**

Provide justification for VFM & Efficiency

There would be a realisation that the public would not be scammed out of rental deposits.

The Housing market would be effectively policed

<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	Air Quality Assistant
<b>Reference</b>	MPG/ PLA 04 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Lead Member</b>	Cllr Rachel Blake
<b>Directorate</b>	Place
<b>Service Area</b>	Environmental Health and Trading Standards
<b>Lead Officer</b>	David Tolley

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	nil	45	45	45
Other Costs		26	5	5
Income				
Reserves				
Capital				
HRA				
<b>Total</b>		71	50	50

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	nil	1	1	1

Description & Justification
<p>Information should include a brief description of the growth requirement; evidence of numbers; cost drivers; impact on outcomes; reasons such as changes in legislation etc</p> <p>The Mayor in Cabinet is set to sign off the Air Quality Action Plan, which has 74 actions that will need to be managed, reviewed and pursued. The current FTE for this work is one Air Quality Officer, whose main task is to ensure that the Councils statutory duty with regards to air quality is maintained.</p> <p>The AQAP requires a number of projects to be run and evaluations carried out.</p> <p>To deliver on the actions for improving the local environment it is proposed that a further 3 static monitors are purchased at a costs of £21k and located at 3 sites as part of enhancing the monitoring of Air Quality</p> <p>There is also an expectation that the Mayors Air Quality grants (£200,000) will be administered from the Service.</p> <p>The Service does not have a sufficient number of qualified staff to meet this demand.</p>

### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance

Creating and maintaining a vibrant and successful place – an improved local environment

Key Deliverable: Improve air quality and enhance the environmental sustainability of the borough; reduce carbon emissions, enhance biodiversity and alleviate fuel poverty:

This additional post will assist with the delivery of the Mayors AQAP – without additional resourcing it is unlikely the action will be achieved

### **Risks & Implications**

Highlight Service/ Corporate associated;

A high profile action plan with associated communications will be unlikely to achieve its potential.

The risk is that few of the detailed actions will be achieved

### **Value for Money & Efficiency**

Provide justification for VFM & Efficiency

The delivery of the air quality action plan, whilst continue to meet our statutory requirements.

The Government could pass on any relevant fines on breeches of the air quality objectives to Local Authorities. By implementing a comprehensive air quality plan the Council may avoid these additional penalties.

<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	Bursary for Environmental Health Trainees
<b>Reference</b>	MPG / PLA 05 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Lead Member</b>	Cllr Amina Ali
<b>Directorate</b>	Place
<b>Service Area</b>	Environmental Health and Trading Standards
<b>Lead Officer</b>	David Tolley

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs	nil	30	30	30
Other Costs				
Income				
To Reserves				
<b>Total</b>		30	30	30

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)	nil	3	3	3

Description & Justification
<p>Information should include a brief description of the growth requirement; evidence of numbers; cost drivers; impact on outcomes; reasons such as changes in legislation etc</p> <p>Due to the difficulties in recruiting Environmental Health staff, this is having a direct impact on not being able to deliver work programmes. We have approximately 15 vacancies across the Service which are being filled, where we can with agency staff. Using agency staff is not a stable platform and there is constant pressure to increase the hourly rate.</p> <p>I would like to be able to offer a £10,000 bursary to final year students to encourage them to have a work placement at Tower Hamlets and assist them with their work based professional portfolios, after which we would encourage them to apply for our vacant positions.</p> <p>The bursary would be given to final year students on the understanding they would be with us for one year training. Provision of a bursary to recruit end of year student Environmental Health Officers, to encourage recruitment of qualified Officers. £10,000 Bursary to final year students to encourage them to have a work placement at LBTH. The current scheme is for a regulators course for one year and then the student moves across to study the professional part (3 years TS and EH course). This is one-off funding.</p>

Budgeted Outcomes/ Accountability (Focus on Improved performance)
<p>Align with the councils strategic priorities; provide performance information data; agreed proposed outcomes and expected improvements in service delivery/ performance</p> <p>Creating and maintaining a vibrant and successful place – without investing in new staff we will not be able to deliver of statutory functions or delivery on other work programmes.</p>



**Risks & Implications**

Highlight Service/ Corporate associated;

We are very reliant on agency staff which does not maintain a stable platform to deliver a service.

**Value for Money & Efficiency**

Provide justification for VFM & Efficiency

It is more efficient in the long term to employ our own staff, by offering bursaries, we will be able to attract, new entrants into Environmental Health, with a view to becoming permanent employees

<b>Growth Type</b>	Mayoral Priority
<b>Title</b>	ASB Neighbourhood Operations
<b>Reference</b>	MPG/ PLA 06 / 18-19
<b>Strategic Priority Area</b>	2.3 People live in safer neighbourhoods and anti-social behaviour is tackled
<b>Lead Member</b>	Cllr Asma Begum
<b>Directorate</b>	Place Directorate
<b>Service Area</b>	Community Safety
<b>Lead Officer</b>	Ann Corbett & Roy Ormsby

Financial Information	Budget Allocation	Growth Bid		
	2017-18 £'000	2018-19 £'000	2019-20 £'000	2020-21 £'000
Employee Costs		145	200	200
Other Costs				
Income				
Reserves				
Capital				
HRA				
<b>Total</b>		145	200	200

Staffing Impact	2017-18	2018-19	2019-20	2020-21
Employees (FTE)		3	4	4

Description & Justification
<p>This investment aims to address community concerns relating to community safety, anti-social behaviour (ASB) continue to be a primary concern for the Mayor, Councillors and residents in the Borough. Tackling crime and ASB is one of the Mayor's key priorities. The Borough has the highest volume of ASB (101 and 999) calls across London boroughs.</p> <p>After 10 years of sustained crime reduction we are moving into an increasingly challenging economic climate. Cutting crime and ASB will not get any easier. The challenge we faced in TH now is different to the challenge faced 3, 5, 7 years ago.</p> <p>The ASB review 2016- 17 highlighted a number of issues and risks. There is a lack of capacity to deliver effectively on ASB casework, and insufficient operational expertise and capacity. In order to sustain and accelerate further improvement on the crime and disorder agenda, the council needs to apply its resources as efficiently and effectively as possible, ensuring its operational structures for crime and disorder delivery are responsive, resident focussed and geographically aligned to operational neighbourhood service clusters. Developing the planned Neighbourhood Management Pilot and realigning our operational response to geographical areas is crucial if we are to address these Mayoral and community Priorities</p> <p><b>Recommendations</b></p> <p>The model is being piloted in areas of the Borough where there is a concentration of ASB problems. The proposal is for a Neighbourhood Manager and Community Warden posts for each Neighbourhood Area to co-ordinate operations that will:</p> <ul style="list-style-type: none"> <li>Enhance the case management and investigation capacity of the current ASB function in PLACE.</li> <li>Co-ordinate operations work in partnership with residents and partner agencies and manage ASB Case Investigation Officers in their area.</li> </ul> <p>The investment identified in this proposal is indicative. Once the pilot has been completed this will inform the</p>

approach that best determines the future requirements to deliver the Neighbourhood model along with alternative approaches to dealing with the problem identified such as investment in other areas such as CCTV and partnership taskforce working.

### **Budgeted Outcomes/ Accountability (Focus on Improved performance)**

The Tower Hamlets Council Strategic Plan 2016-19 identifies 'People feel safe and places have less crime and ASB' as one of the desired outcomes. It will be achieved only when all the partners work together with sufficient resources.

Additional neighbourhood area based Community Safety Operations Managers and ASB Case Investigation Officers will help provide a council response to our responsibility to tackle ASB in our neighbourhoods and link in to partnership agencies within these areas to ensure that response is co-ordinated and cost effective, this includes the new Neighbourhood Policing Support Teams and additional officers for our housing estates being funded by the Council.

It will help to build accountability and confidence at the community level, increasing visibility and tackling those issues that matter most to our residents. Expanding the capacity of our currently very limited ASB service will help tackle a wider range of anti-social behaviour issues, and prevent their escalation into more serious offences including violent crime and the use of offensive weapons like knives and acid/corrosive substance.

The investment in additional neighbourhood based ASB/community safety teams will, therefore, save the council in the long run by using the powers available to us to at the point of need and reduce our reputational risk as being seen as inactive and ineffective in exercising our statutory responsibilities to tackle and reduce ASB by both partner agencies and more importantly the communities we serve.

Aligns to the strategic priorities

- Less crime and ASB
- An improved environment

Crime continues to be the second highest priority for Tower Hamlets residents. Nationally all crime is on the increase. Although the crime profile for the Borough has seen some reductions in traditional volume crime – the borough still has the highest level of ASB demand in London. Complaints and casework in relation to ASB and drugs is increasing.

#### **Outcomes**

Co-ordinated and effective response to ASB

ASB and crime reduces

Confidence and satisfaction increases

Reduction in MEs and Customer Complaints

### **Risks & Implications**

Highlight Service/ Corporate associated;

- Crime & ASB goes up.
- Resident dissatisfaction increases & Increasing complaints in relation to ASB and crime to the council
- Perceptions and feelings of safety
- The council is unable to deliver on the recommendation from the ASB Review
- This proposal will help reduce the Council's reputational risks. It aims to address community concerns relating to community safety in the Borough which has the highest volume of ASB (101 and 999) calls across London boroughs. Action to tackle these problems will reassure the residents.

## Value for Money & Efficiency

The cost to the public purse in relation to crime and ASB is significant, in total there were 37,942 crimes in the borough (Total Notifiable Offences) over the 12 months up to and including 5<sup>th</sup> October 2017, this is up 6% on the previous 12 month period. The Home Office most recently updated their Cost of Crime Calculator in 2010 with the cost per crime varying considerably within that, ranging from murders estimated at costing £1,774,681 and shoplifting costing £124 each.

Recorded Offences	Number of incidents in Tower Hamlets	Unit costs	Total estimated costs (year up to 5 Oct 2017)
<b>Criminal damage</b>	2,432	£1,053	£2,560,896
<b>Knife injury victims (U25 non DA)</b>	106	£25,747	£2,729,182
<b>Robbery personal property</b>	1,389	£8,810	£12,237,090

### Sources

MPS daily dashboard report period ending 5 October 2017

"Revisions made to the multipliers and unit costs of crime used in the Integrated Offender Management Value for Money Toolkit"

(<https://www.whatdotheyknow.com/request/163974/response/411544/attach/4/Further%20information.pdf>)

# **Appendix 4**

# **SAVINGS**

Directorate	2018/19 £'000	2019/20 £'000	2020/21 £'000	Total £'000
Health, Adults and Community	-	-	1,000	1,000
Children's Services	300	-	350	650
Place	-	-	880	880
Governance	-	-	-	-
Resources	-	-	2,550	2,550
Corporate Costs	1,458	-	4,250	5,708
<b>Total</b>	<b>1,758</b>	<b>-</b>	<b>9,030</b>	<b>10,788</b>

Strategic Priority Area	2018/19 £'000	2019/20 £'000	2020/21 £'000	Total £'000
1.1 People access a range of education, training, and employment opportunities and feel they share	-	-	-	-
1.2 Children and young people feel they are protected and get the best start in life and realise their	-	-	-	-
1.3 People access joined-up services when they need them and feel healthier and independent	-	-	1,000	1,000
1.4 Inequality is reduced and people live in a cohesive community	300	-	350	650
2.1 People live in a borough that is clean and green	-	-	680	680
2.2 People live in good quality and affordable homes and neighbourhoods	-	-	100	100
2.3 People live in safer neighbourhoods and anti-social behaviour is tackled	-	-	-	-
3.0 A focussed and efficient Council co-producing excellent services	1,458	-	6,900	8,358
<b>Total</b>	<b>1,758</b>	<b>-</b>	<b>9,030</b>	<b>10,788</b>

Ref	Directorate	Service Area	Title	Lead Member	Strategic Priority Area	Themes	2018/19 £'000	2019/20 £'000	2020/21 £'000	TOTAL £'000	Is an Equalities Analysis required?	Proposed level of public consultation
SAV/ CHI 01 / 18-19	Children's Services	Sports, Culture and Youth	Events In Parks - Income Generation	Cllr Amy Whitelock-Gibbs	1.4 Inequality is reduced and people live in a cohesive community	Smarter Business Support	300	-	350	650	No	N/A
SAV/ HAC 01 / 18-19	Health, Adults and Community	Adult Social Care	Adult Social Care Transformation	Cllr Denise Jones	1.3 People access joined-up services when they need them and feel healthier and independent	Smarter Demand Management	-	-	1,000	1,000	Yes	General public and service user specific consultation
SAV/ PLA 01 / 18-19	Place	Public Realm	Waste, Recycling & Street Cleansing Contract	Cllr Rachel Blake	2.1 People live in a borough that is clean and green	Smarter Business Support	-	-	200	200	No	N/A
SAV/ PLA 02 / 18-19	Place	Housing /THH	Review of Housing Delivery (THH/TH)	Cllr Sirajul Islam	2.2 People live in good quality and affordable homes and neighbourhoods	Smarter Business Support	-	-	100	100	No	N/A
SAV/ PLA 03 / 18-19	Place	Asset management	Reduction in Running costs/ Liability of Council Assets	Cllr Sirajul Islam	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	100	100	No	N/A
SAV/ PLA 04 / 18-19	Place	Public Realm	Street Lighting Efficiencies	Cllr Amina Ali	2.1 People live in a borough that is clean and green	Smarter Service Design	-	-	180	180	No	N/A
SAV/ PLA 05 / 18-19	Place	Public Realm & Parks	Review of Parks	Cllr Abdul Mukit	2.1 People live in a borough that is clean and green	Smarter Service Design	-	-	300	300	No	N/A
SAV/ RES 01 / 18-19	Resources	Housing Benefits	Improved Recovery of Housing Benefits Overpayments	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	500	500	No	N/A
SAV/ RES 02 / 18-19	Resources	Human Resources	HR Services - Additional Staffing Efficiencies	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	100	100	No	N/A
SAV/ RES 03 / 18-19	Resources	Audit	Internal Audit – Streamline Management and Explore Shared Service Options	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	50	50	No	N/A
SAV/ RES 04 / 18-19	Resources	Revenues Services	Revenue Services – Workforce efficiencies through greater self-service and automation	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	100	100	Yes	General public consultation
SAV/ RES 05 / 18-19	Resources	ICT	ICT Savings	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	750	750	No	N/A
SAV/ RES 06 / 18-19	Resources	Finance	Finance Services – Process improvements and new Finance System Implementation	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	100	100	No	N/A
SAV/ RES 07 / 18-19	Resources	Wi-Fi Concession Contract	Income Through Wi-Fi Concession Contract	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	300	300	No	N/A
SAV/ RES 08 / 18-19	Resources	Housing	Income Through Housing Companies	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	250	250	No	N/A
SAV/ RES 09 / 18-19	Resources	Housing	THH - Potential support service Savings	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Service Design	-	-	100	100	No	N/A
SAV/ RES 10 / 18-19	Resources	Customer Access	Additional Local Presence Efficiencies	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Customer Access	-	-	300	300	Yes	General public consultation
SAV/ CORP 01 / 18-19	Corporate Costs	Treasury Management	Treasury Management Investment Opportunities	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	1,458	-	-	1,458	No	N/A
SAV/ CORP 02 / 18-19	Corporate Costs	Procurement/Contract Management	Contract Management Efficiencies	Cllr David Edgar	3.0 A focussed and efficient Council co-producing excellent services	Smarter Business Support	-	-	4,250	4,250	No	N/A
<b>TOTAL</b>							<b>1,758</b>	<b>-</b>	<b>9,030</b>	<b>10,788</b>		

<b>Project Title</b>	Events in Parks – Income Generation
<b>Reference</b>	SAV/ CHI 01 / 18-19
<b>Strategic Priority Area</b>	1.4 Inequality is reduced and people live in a cohesive community
<b>Directorate</b>	Children’s Services

### Executive Summary

In January 2017, Cabinet report “Contractual arrangements for commercial and community events” agreed to re-let the Victoria Park major events concessions contract. The outcome of the re-tendering process and changes in the events market since 2014 has resulted in a significantly higher income being achieved whilst minimising impact on the local residents and other park users.

As a consequence of the new contract, it is proposed to increase the annual contribution to the MTFS as set out below. This additional income above that currently assumed in the budget takes account of the need to address pressures in the core budget which have previously been covered on an ad-hoc basis from the Victoria Park income.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2018-19 £'000	Net Savings 2020-21 £'000	Original FTE	Total FTE reduction 2020-21
E46	49342	(390)	(300)	(350)		



<b>Project Title</b>	Adult Social Care Transformation
<b>Reference</b>	SAV/ HAC 01 / 18-19
<b>Strategic Priority Area</b>	1.3 People access joined-up services when they need them and feel healthier and independent
<b>Directorate</b>	Health, Adults and Community

### Executive Summary

There is a significant programme of transformation within Adult Social Care which includes:

- Demand management
- Redesign of the 'front door'
- Increased efficiency and effectiveness of short term support including re-ablement
- Practice improvement in line with the Care Act 2014 and Making Safeguarding Personal
- Redesign of front-line teams to form integrated locality model with health
- Development of a "single point of access" across health and social care
- A new learning disability strategy to deliver improved local housing and support options which will over time reduce our reliance on expensive residential care out of the borough
- Working with Workpath to improve employment rates for those with mental health problems and those with a learning disability
- Increasingly integrated commissioning under the governance of the Health & Wellbeing Board

Aspects of this work have already been linked to savings within the current MTFS.

Where there is slippage on the current savings programme, there is a focus on ensuring these work strands remain on track against amended trajectories and where possible are brought back in line with anticipated timescales. Mitigation of the slippage this year is largely through use of the Improved Better Care Fund which is non-recurrent funding. It is not proposed to extend the current savings targets until delivery is in a firmer position and impact can be better assessed.

In some areas, it is likely that further savings will be possible although firm proposals are not yet developed. These include:

- Demand Management – work carried out by Impower (under the transformation strategic partnership) has highlighted the potential for improved conversations with residents at the front door of Adult Social Care and during annual reviews. Trials using behaviour insights methodology have been concluded and this demonstrates a positive impact of the approach. However, the financial assessment of impact is insufficient for a full business case at this stage.
- The redesign of the front-door – as we move towards more integration with health and as we make improvements to our processes at the front door, there is potential for savings through faster access to short term support where appropriate and through effective strength-based care planning and more creative use of personal budgets and direct payments.

Work will need to be done during the next year to develop more specific savings proposals however there is sufficient indication that further savings will be possible. The savings are more likely to be from care packages rather than directly employed staff budgets.

**Options Analysis**

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1	Identify further savings from adult social care based on specific business cases	More clearly identifies where anticipated savings will come from	Work on demand management and the front-door model is not yet at a stage where robust business cases can be developed	Further work does not identify specific savings opportunities	92.805m	N/A as not developed
2	Do not identify any further savings from adult social care	Protects adult social care from having to find further savings	<ul style="list-style-type: none"> <li>No contribution to the overall financial gap and areas where higher comparative costs are indicated would not get addressed</li> </ul>	<ul style="list-style-type: none"> <li>Challenge around effective use of resources</li> </ul>	92.805m	0
3	Identify a high level, indicative saving which is likely to be possible through further work on adult social care transformation particularly around demand management and the model at the front-door	<p>Keeps a focus on transformation and effective use of resources</p> <p>Contributes to the overall financial sustainability of the Council</p>	<ul style="list-style-type: none"> <li>Saving outline is high level and subject to further work and analysis</li> </ul>	<ul style="list-style-type: none"> <li>Further work does not identify specific savings opportunities</li> </ul>	92.805m	500k to £1m

**Recommended Option**

Option 3

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget 2017/18 £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
Adult Social Care	Various – most likely care package cost centres	£92.805m	£0.5m-£1m		N/A	N/A – unlikely to be staffing reductions

### Risks

Identified Risk	Trigger	Risk Approach	Owner	Score			Mitigation that will be developed into control measures
				Likelihood	Impact	Profile	
That further work does not demonstrate robust business cases for further savings	Further work on demand management and the model at the front door	Accept risk and mitigate	Corporate Director, Health, Adults & Community	1	4	4	Continue to work on several different aspects of transformation so that more than one business case is considered

Red (Severe) (15+)	Amber (Significant) (10+)	Yellow (Material) (5+)	Green (Manageable) (up to 4)
Serious concern. Comprehensive Management action required immediately.	Significant concern. Some immediate action required plus comprehensive action plans.	Incidences of risk are of some concern although treating the risk will usually be through contingency planning. Risk to be kept under regular monitoring	The risk is relatively however risk should be monitored.

<b>Project Title</b>	Waste, Recycling & Street Cleansing Contract
<b>Reference</b>	SAV/ PLA 01 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Directorate</b>	Place

### Executive Summary

There may be the potential for savings from the procurement of the Waste and Recycling Collection and Street Cleansing contracts. This will be determined by the commercial appetite of bidding contractors and our ability to maintain or improve the level and quality of service as part of the tender award process. Officers are tasked with trying to achieve procurement savings from all major contracts and given the scale of this service it is anticipated that there will be significant market interest and therefore at least some potential for savings to be achieved. The level of potential scope for savings will only become apparent once the tender specification has been drawn up however given the long lead in time, there are opportunities to review or amend the proposal as the specification develops. Actual levels of savings that could be delivered through this proposal will not be known until the procurement exercise is undertaken but a working assumption of a minimum £200k per annum from 2020-21 is believed to be a reasonable starting point.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1	Waste, Recycling & Street Cleansing Contract	Given the scale of the service, procurement savings could be realised as part of the tender award process.			£20m	£200k

### Recommended Option

No recommended options at present. Further work is required to be undertaken to determine the most appropriate commissioning options for the future delivery of recycling, refuse and street cleansing services as a result of the review

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
E15			200			

<b>Project Title</b>	Review of Housing Delivery (THH/TH)
<b>Reference</b>	SAV/ PLA 02 / 18-19
<b>Strategic Priority Area</b>	2.2 People live in good quality and affordable homes and neighbourhoods
<b>Directorate</b>	Place

### Executive Summary

Review of Housing Delivery (THH/TH) - Management & Service Delivery Efficiencies - Subject to review being undertaken to determine the level of potential savings that can be achieved.

Similar to (RES 009) which relates to opportunities to rationalise and streamline support services; it is anticipated that the management and service delivery would also be expected to yield efficiencies from the possible consolidation of its service delivery teams where there should be clear synergies in the delivery of capital programme; delivery of housing maintenance and other similar services.

There are housing related projects within both THH and TH designed to deliver new housing supply and carry out improvements to existing stock. A review will be undertaken to explore options to streamline management responsibilities and rationalise teams responsible for these areas with a view to delivering efficiency savings by 2020-21. Actual levels of savings that could be delivered through this proposal will not be known until the review is concluded but a working assumption of a minimum £100k per annum from 2020-21 is believed to be a reasonable starting point.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1	Review of Housing Delivery (THH/TH)	Management & Service Delivery Efficiencies through clear synergies in the consolidation of delivery teams				£100k

### Recommended Option

No recommended options at present subject to review on the management and service delivery being undertaken.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
TBC	TBC	TBC	100			

<b>Project Title</b>	Reduction in Running Costs / Liability of Council Assets
<b>Reference</b>	SAV/ PLA 03 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Place

### Executive Summary

The Council will review its current asset base and look to increase the efficiency in the use of its buildings through consideration of a range of options including their possible disposal or use as part of investment proposals. The intention is to reduce the need for the Council to fund running costs of those assets from its core budget either through eliminating costs through disposal or covering those costs in other ways such as through income from tenants. This applies to the normal building operating costs such as utility costs and business rates.

### Recommended Option

No recommended options at present subject to review on the management and service delivery being undertaken.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
Asset Management	Various	TBC	100		TBC	TBC

<b>Project Title</b>	Street Lighting Efficiencies
<b>Reference</b>	SAV/ PLA 04 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Directorate</b>	Place

### Executive Summary

Street Lighting Efficiencies – The introduction of long life LED lighting will enable savings to be made on the current energy consumption costs of approx. £600k per annum and from the maintenance budget of £541k. If the Remote Monitoring Capital bid is agreed then there is the potential for up to 100k to be deliverable from both efficiencies being implemented. This takes into account additional costs that will be incurred to service a back office data agreement with the service provider.

The current £15m capital investment in Street Lighting provides the opportunity to amend the current programme to include remote monitoring. Remote monitoring allows more effective management of the lighting stock, with less time out of lighting, but also allows the profile of lighting to be shaved at both the start and end of the lighting period. This is in addition to the dimming of lights to an extent where there is not a noticeable impact, but reduces the cost of energy. The proposed additional capital of £1.2m would allow retro fitting of those columns already replaced and for any new columns to be fitted along with their new LED fixtures.

### Recommended Option

Reduction in maintenance costs if remote monitoring of Street Lighting is agreed based on Capital investment in the Borough.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
TBC	TBC	TBC	180			

<b>Project Title</b>	Review of Parks
<b>Reference</b>	SAV/ PLA 05 / 18-19
<b>Strategic Priority Area</b>	2.1 People live in a borough that is clean and green
<b>Directorate</b>	Place/Children's

### Executive Summary

Review of Parks

- Review of operations and delivery of parks service –this proposal will consider the way that services are delivered through consideration of amalgamating operations.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1	Amalgamations of operation					150
2	Other - TBC					150

### Recommended Option

Detailed options to be developed but will include options that consider amalgamation of operations and strategic responsibility.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
TBC	TBC	TBC	300		TBC	TBC



<b>Project Title</b>	Improved Recovery of Housing Benefits Overpayments
<b>Reference</b>	SAV/ RES 01 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

Improve recovery of Housing Benefits Overpayments through earlier engagement. This follows an independent review undertaken in 2017 which proposes that increasing resources within the Benefits Service Overpayments Team will enable additional income through recovery of £500k p.a. The saving is considered to be a net benefit and will require investment in additional staff resources to achieve.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1.	Improved recovery of Housing Benefits Overpayments	Increase resources to recover Overpayments and greater use of new powers, new systems, interventions and DWP data. Focus on early engagement when overpayments are raised for new overpayments, ensuring proposed recovery meets tackling poverty criteria and vulnerable households are supported e.g. overpayment recovery deferred where appropriate, debt advice, support provided. Use of new powers and data access to identify in work residents who have ignored invoices, making contact to obtain agreements to repay or use direct earnings attachment powers.	Under resourcing minimises income recovery	Failure to maximise income were the additional resources not secured.		£500k

### Recommended Option

Increase resources by recruitment of 4 Benefits Overpayment Recovery staff

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
Housing Benefits	Various		500			0

<b>Project Title</b>	HR Services - Additional Staffing Efficiencies
<b>Reference</b>	SAV/ RES 02 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

The HR service currently has a controllable budget of c.£4.8m (gross budget £6.1m) and there are agreed savings of £1.5m to be delivered by 2018-19. To deliver these savings the service will be undergoing a fundamental service transformation and current indications are that further efficiencies could be achievable by 2020-21 through organisation re-design and systems improvements.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1.	Additional staffing efficiencies.		Less resources to deliver HR service			£100k

### Recommended Option

Additional staffing savings through HR service redesign

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
HR	Various		100			2

<b>Project Title</b>	Internal Audit – Streamline Management and Explore Shared Service Options
<b>Reference</b>	SAV/ RES 03 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

A shared service offers the opportunity to share the cost of management, particularly around sharing the cost of the Head of Audit, and to a lesser extent, the Audit Manager. A shared service offers the possibility of sharing ideas and best practice allowing internal audit to raise recommendations to improve council service. A shared service will also offer increased resilience when staff leave and place reliance on firms providing the service. The disadvantage of a shared service is that the capacity of the Head of Audit to be involved at the Council will decrease.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1	Shared Services	Sharing good practice and ideas across a group of local authorities and increased resilience	Capacity of senior audit professionals to engage with all organisations in the group and provide a strategic steer.	Shared service does not lead to perceived benefit / internal audit work not completed.	£525k	£50k

### Recommended Option

Explore a shared audit service option and determine whether to pursue this option "in principle."

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
R34	23320		£50k		9	0.5

**Risks**

Identified Risk	Trigger	Risk Approach	Owner	Score			Mitigation that will be developed into control measures
				Likelihood	Impact	Profile	
Shared service does not lead to perceived benefit / internal audit work not completed.	Poor internal audit delivery, unresponsive.	Treat	Minesh Jani	3	4	12	Ensure the arrangements meet expectation by developing a project plan

Red (Severe) (15+)	Amber (Significant) (10+)	Yellow (Material) (5+)	Green (Manageable) (up to 4)
Serious concern. Comprehensive Management action required immediately.	Significant concern. Some immediate action required plus comprehensive action plans.	Incidences of risk are of some concern although treating the risk will usually be through contingency planning. Risk to be kept under regular monitoring	The risk is relatively however risk should be monitored.

<b>Project Title</b>	Revenue Services – Workforce efficiencies through greater self-service and automation
<b>Reference</b>	SAV/ RES 04 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

The proposal is to conduct a comprehensive process review of the Council's Revenue Services, which will aim to automate and digitise services and promote self-service options. This will remove the need for manual interventions thereby delivering savings through reduced spend on staffing resources.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1	Revenue Services Process Review	To improve self-service options and digital contact	None	Low take up of self service options	£1,918,132	£100,000

### Recommended Option

To be developed through review of the service and processes. This should include better use of digital and telephone options to reduce manual/face to face interactions.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
Council Tax	23410	£1,918	100		34	3

### Risks

Identified Risk	Trigger	Risk Approach	Owner	Score			Mitigation that will be developed into control measures
				Likelihood	Impact	Profile	
Self Service take up and process redesign does not work	Low take up		Roger Jones	2	2	4	Promotion of service and other access routes taken away

Red (Severe) (15+)	Amber (Significant) (10+)	Yellow (Material) (5+)	Green (Manageable) (up to 4)
Serious concern. Comprehensive Management action required immediately.	Significant concern. Some immediate action required plus comprehensive action plans.	Incidences of risk are of some concern although treating the risk will usually be through contingency planning. Risk to be kept under regular monitoring	The risk is relatively however risk should be monitored.

<b>Project Title</b>	ICT Savings
<b>Reference</b>	SAV/ RES 05 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

The proposal is to review approaches to how ICT service provision is delivered. The end of the initial term of the contract with our ICT partner provides an opportunity to review the arrangements for aspects of ICT service provision including project management, application support and third party management with a view to exploring more cost effective options.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1	Continue as is	Continuity of service	No savings.	Continuing or increasing costs	£7.7m	0
2	Implement simple changes	Continuity of service with some savings	Only proportion of potential savings,	Difficult to achieve balance between cost and service.	£7.7m	£100,000
3	Full review and implementation of changes	Full savings from these areas and a new integrated model for delivery.	Effort and costs to fully review and implement changes.	Change and potential disruption to service.	£7.7m	£750,000

### Recommended Option

A full review of all aspects of ICT provision (option 3) will be undertaken with a view to achieving a new integrated model while delivering savings.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
Resources / IT						No predicated on FTE reduction.

**Risks**

Identified Risk	Trigger	Risk Approach	Owner	Score			Mitigation that will be developed into control measures
				Likelihood	Impact	Profile	
Service disruption	Inadequate change management	Treat Tolerate	DDIT	1	2	3	Engage change manager, early engagement with staff, supplier and stakeholders. Accept there will be some disruption communicate accordingly.
Service disruption	Staffing challenges	Tolerate Treat	DDIT	2	3	5	Treat by scheduling work accordingly and being ready to engage with interims as required.
Service disruption	Skills challenges	Treat	DDIT	1	3	3	Early engagement to identify requirements, plan training, manage HR issues.
Delays	Supplier delays	Treat	DDIT	1	5	5	Early engagement with suppliers to provide maximum time to iron out problems. Consider alternatives where possible.
Costs in transition	Contract variations	Treat	DDIT	1	5	5	Engage contract manager with extensive experience in novation. Consider alternatives where possible.

Red (Severe) (15+)	Amber (Significant) (10+)	Yellow (Material) (5+)	Green (Manageable) (up to 4)
Serious concern. Comprehensive Management action required immediately.	Significant concern. Some immediate action required plus comprehensive action plans.	Incidences of risk are of some concern although treating the risk will usually be through contingency planning. Risk to be kept under regular monitoring	The risk is relatively however risk should be monitored.

<b>Project Title</b>	Finance Services – Process improvements and new Finance System Implementation
<b>Reference</b>	SAV/ RES 06 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

Review and implementation of a new finance system is expected to deliver additional savings through system and process efficiencies in finance.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1.	Additional staffing efficiencies.		Less resources to deliver HR service			£100k

### Recommended Option

To be developed through service design and new system.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000	Original FTE	Total FTE reduction 2020-21
Finance	Various		100		2



<b>Project Title</b>	Income Through Wifi Concession Contract
<b>Reference</b>	SAV/ RES 07 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

The Council is embarking on a 'Public WiFi for All' programme. Cabinet considered a report on this on the 27th June 2017. The project will enable Connectivity Providers access to Council owned assets on a non-exclusive basis, and give them permission to deploy technology and fibre, at their own cost and in return for a fee to the Council, thereby improving local connectivity capacity and coverage.

The use of a concession arrangement will also enable the Council to generate revenue from allowing Providers access to our assets.

### Budget Projection and Staffing Impact

<b>Service/Vote</b>	<b>Cost Centre</b>	<b>Base Budget £'000</b>	<b>Net Savings 2020-21 £'000</b>	<b>Original FTE</b>	<b>Total FTE reduction 2020-21</b>
Various	Various	N/A	300		

<b>Project Title</b>	Income Through Housing Companies
<b>Reference</b>	SAV/ RES 08 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

In February 2017 Cabinet agreed to establish two housing delivery vehicles, in order to expand the range of options available to the Council to deliver new supply across tenures, both permanent and temporary homes, with the two vehicles designed to operate in tandem:

1. A Wholly Owned Company (WOC) with a commercial purpose to provide homes for rent and sale, returning a dividend to the Council from long term profit-making activities; and
2. A charitable Community Benefit Society (CBS) to provide homes for sub-market rent, subsidised by grant of land and retained Right To Buy receipts, made possible by governance arrangements within which the Council holds a minority position.

Initial assumption are that the WOC is expected to generate at least £250k per annum from 2020-21.

### Recommended Option

Income generation through a wholly owned housing company.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
Housing (GF)	Various	n/a	250			

<b>Project Title</b>	THH - Potential Support Service Savings
<b>Reference</b>	SAV/ RES 09 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

The Council will explore options for the future management of its housing stock in the borough including the option to bring Tower Hamlets Homes (THH) back in house.

It is anticipated that the review will identify opportunities to rationalise and streamline support service processes and teams, including HR, Finance, ICT and other support services with a view to delivering at least £100k per annum general fund savings from 2020-21.

Any saving is dependent on the outcome of the review.

### Budget Projection and Staffing Impact

<b>Service/Vote</b>	<b>Cost Centre</b>	<b>Base Budget £'000</b>	<b>Net Savings 2020-21 £'000</b>	<b>Original FTE</b>	<b>Total FTE reduction 2020-21</b>
Housing	Various	TBC	100	TBC	<b>TBC</b>

<b>Project Title</b>	Additional Local Presence Efficiencies
<b>Reference</b>	SAV/ RES 10 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

Further local presence and customer access improvements - (1) continue to develop/drive/encourage take up of digital services to further reduce demand for phone and face-to-face contact, thus enabling further staffing reductions (2) investigate options for including Clean & Green call handling within new refuse & recycling contract (3) consider moving to digital-only access for appropriate service areas

### Budget Projection and Staffing Impact

<b>Service/Vote</b>	<b>Cost Centre</b>	<b>Base Budget £'000</b>	<b>Net Savings 2020-21 £'000</b>	<b>Original FTE</b>	<b>Total FTE reduction 2020-21</b>
Various	Various	TBC	300		

<b>Project Title</b>	Treasury Management Investment Opportunities
<b>Reference</b>	SAV/ CORP 01 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

Historically the Council has invested its cash balances over shorter terms in institutions to maintain the capital value of the investment. With interest rates at historically low levels, the Council is only earning around 0.6% on investment balances which currently total over £400m and this level of return is below inflationary increases.

Latest cash flow forecasts indicate that the total value of these cash/investment balances will not be spent for at least five years, and thus it is proposed that the Council considers longer term investments into bonds, property and equity funds to generate higher investment returns over the longer term. However these potential investments will have a higher risk and could show short-term losses in value until values recover in the long-term.

The Council's new treasury advisor, Arlingclose is working with officers to develop a diversified strategy, within an acceptable risk appetite, to generate increased investment returns on the investment portfolio and an additional income target of up to £1.458m is estimated to be achievable. A range of risk levels will be considered.

Some property and equity investments have seen strong growth in recent years, therefore there is a risk that investment values might fall in the short-term.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2018-19 £'000		Original FTE	Total FTE reduction 2020-21
	23195		1,458		nil	nil

**Risks**

Identified Risk	Trigger	Risk Approach	Owner	Score			Mitigation that will be developed into control measures
				Likelihood	Impact	Profile	
Investment values fall	Financial market downturn	Maintain investment to avoid crystallising losses with expectation that investment values will recover in time.		2	2	4	Diversified investment strategy
Borrowing requirement as long term investments have tied up cash balances	Capital spend increasing in short-term	Cash flow forecasts to be monitored		1	1	1	Short-term borrowing might be required to cover cash flow requirements

Red (Severe) (15+)	Amber (Significant) (10+)	Yellow (Material) (5+)	Green (Manageable) (up to 4)
Serious concern. Comprehensive Management action required immediately.	Significant concern. Some immediate action required plus comprehensive action plans.	Incidences of risk are of some concern although treating the risk will usually be through contingency planning. Risk to be kept under regular monitoring	The risk is relatively however risk should be monitored.

<b>Project Title</b>	Contract Management Efficiencies
<b>Reference</b>	SAV/ CORP 02 / 18-19
<b>Strategic Priority Area</b>	3.0 A focussed and efficient Council co-producing excellent services
<b>Directorate</b>	Resources

### Executive Summary

The Council spends over £320million every year on goods and services with a current supplier base of approximately 2,743 suppliers. Whilst, the recent improvements implemented will result in better visibility of our spend, a number of concerns remains with the devolved activity including; Quality of specifications; lack of aggregation of demand resulting inability to secure VFM and lack of procurement skills and experience of buyers resulting in compliance issues. The savings initiatives have been broadly categorised across the following three key areas.

- Category Management
- Commercial and Policy Changes
- Contract Efficiencies/SRM

#### Category Management

Extending the existing category management approach to all devolved procurement expenditure to ensure leverage is obtained from the appropriate shaping of demand and the aggregated purchase of common requirements across the organisation.

#### Commercial and Policy Changes

This theme focusses on reviewing Councils historic approach to the use of quality and price weighting in our tenders, use of framework contracts and e-auctions. Frameworks as a procurement route are becoming the default strategy for approaching the market rather than an option to be considered if other options do not provide a better solution. Frameworks always cost money to use (a levy) and this levy is in the region of 0.5 to 5% (1% to 3% is the more common range). However, that means that when used, the contracts we secure have that added premium on the prices we pay and it should not always be assumed that this represents best value for money.

#### Contract Efficiencies and Supplier Relationship Management

A forward plan of our high value procurement activity to 2022 has been developed and a high level review of contract management across the organisation is underway. The outcome of this piece of work will assist in developing potential options to secure further efficiencies from our current approach to contract management as well investigate opportunity to initiative a broader renegotiation of our high value contracts.

### Options Analysis

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
1	Continue as is	Continuity of service	No savings. Commercial arrangement hinders operational, tactical and strategic agility.	Increasing costs based on day rates and percentage of spent	0	0
2	Expand Category Management and strengthen Contract Management	Greater level of spend under contract with improved supplier relations	None	Unwillingness from directorate to take ownership of new contracts or support further renegotiation of existing contract	£320m	£4.250m

Option	Description Title	Benefits	Dis benefits	Risks	Current Annual Costs	Proposed Annual Savings (ROI)
3	Centralise all cross Directorate contracts	Direct operational, tactical and strategic control to align with council priorities. Full savings from these areas.	Additional resource cost to manage centrally. In some instance officers managing contracts also responsible for managing day to day service provision	Disjoint between central team and operational service delivery		

### Recommended Option

Option 2 – Extend Category Management and Initiate Supplier Relationship Management programme to increase spend under contract as well launch a renegotiations of existing contracts to secure further efficiencies.

### Budget Projection and Staffing Impact

Service/Vote	Cost Centre	Base Budget £'000	Net Savings 2020-21 £'000		Original FTE	Total FTE reduction 2020-21
Supplies and Services	Various	c.£320m	£4.250m			N/A



## **Appendix 5**

# **RESERVES POLICY**

## Reserves Policy

### 1. Background and Context

- 1.1. Sections 32 and 43 of the Local Government Finance Act 1992 require local authorities to consider the level of reserves when setting a budget requirement. Section 25 of the Local Government Act 2003 requires the Chief Financial Officer (Section 151 Officer) to report formally on the adequacy of proposed reserves when setting a budget requirement. The accounting treatment for reserves is set out in the Code of Practice on Local Authority Accounting.
- 1.2. CIPFA has issued Local Authority Accounting Panel (LAAP) Bulletin No.55, Guidance Note on Local Authority Reserves and Balances and LAAP Bulletin 99 (Local Authority Reserves and Provisions). Compliance with the guidance is recommended in CIPFA's Statement on the Role of the Chief Financial Officer in Local Government.
- 1.3. This policy sets out the Council's approach for compliance with the statutory regime and relevant non-statutory guidance.
- 1.4. Reserves are an important part of the Council's financial strategy and are held to create long-term budgetary stability. They enable the Council to manage change without undue impact on the Council Tax and are a key element of its strong financial standing and resilience. The Council's key sources of funding face an uncertain future and the Council therefore holds earmarked reserves and a working balance in order to mitigate future financial risks.
- 1.5. Earmarked reserves are reviewed annually as part of the budget process, to determine whether the original purpose for the creation of the reserve still exists and whether or not the reserves should be released in full or in part. Particular attention is paid in the annual review to those reserves whose balances have not moved over a three year period.

### 2. Overview

- 2.1. The Council's overall approach to reserves will be defined by the system of internal control. The system of internal control is set out, and its effectiveness reviewed, in the Annual Governance Statement. Key elements of the internal control environment are objective setting and monitoring, policy and decision-making, compliance with statute and procedure rules, risk management, achieving value for money, financial management and performance management.
- 2.2. The Council will maintain:
  - a general fund general reserve;
  - a housing revenue account (HRA) general reserve; and
  - a number of earmarked reserves.
- 2.3. Additionally the Council is required to maintain **unusable** reserves to comply with accounting requirements although, as the term suggests, these reserves are not available to fund expenditure.
- 2.4. The level of the general reserve is a matter for the Council to determine having had regard to the advice of the S151 Officer. The level of the reserve will be a matter of judgement which will take account of the specific risks identified through the various corporate processes. It will also take account of the extent to which specific risks are supported through earmarked reserves. The level will be expressed as a cash sum over the period of the general fund medium-term financial strategy. The level will also be expressed as a percentage of the general funding requirement (to provide an indication of financial context).
- 2.5. In principle, only the income derived from the investment of reserve funds should be available to support recurring spending.

### 3. Strategic context

- 3.1. The Council is facing a significant withdrawal of grant funding and the transfer of funding risk from Government with demand for at least some services forecast to grow. The Council has to annually review its priorities in response to these issues.
- 3.2. Reserves play an important part in the Council's medium term financial strategy and are held to create long-term budgetary stability. They enable the Council to manage change without undue impact on the Council Tax and are a key element of its strong financial standing and resilience.
- 3.3. The Council holds reserves in order to mitigate future risks, such as increased demand and costs; to help absorb the costs of future liabilities; and to enable the Council to resource policy developments and initiatives without a disruptive impact on Council Tax.
- 3.4. Capital reserves play a crucial role in funding the Council's Capital Strategy. The Capital Expenditure Reserve is used to create capacity to meet future capital investment.
- 3.5. The Council relies on interest earned through holding reserves to support its general spending plans.
- 3.6. Reserves are one-off money. The Council aims to avoid using reserves to meet ongoing financial commitments other than as part of a sustainable budget plan. The Council has to balance the opportunity cost of holding reserves in terms of Council Tax against the importance of interest earning and long term future planning.

### 4. Purposes

- 4.1. Reserves are therefore held for the following purposes, some of which may overlap:
  - Providing a working balance i.e. Housing Revenue Account and General Fund general reserves.
  - Smoothing the impact of uneven expenditure profiles between years e.g. local elections, structural building maintenance and carrying forward expenditure between years.
  - Holding funds for future spending plans e.g. Capital Expenditure Reserve, and for the renewal of operational assets e.g. repairs and renewal, and Information Technology renewal.
  - Meeting future costs and liabilities where an accounting 'provision' cannot be justified.
  - Meeting future costs and liabilities so as to cushion the effect on services e.g. The Insurance Reserve for self-funded liabilities arising from insurance claims.
  - To provide resilience against future risks.
  - To create policy capacity in a context of forecast declining future external resources e.g. Tackling Poverty Reserve.
- 4.2. All earmarked reserves are held for a specific purpose. This, together with a summary on the movement on each reserve, is published annually, to accompany the annual Statement of Accounts.
- 4.3. The use of some reserves is limited by regulation e.g. the Collection Fund balance must be set against Council Tax levels, reserves established through the Housing Revenue Account can only be applied within that account and the Parking Reserve can only be used to fund specific spending. Schools reserves are also ring-fenced for their use, although there are certain regulatory exceptions.

### 5. Management

- 5.1. All reserves are reviewed as part of the budget preparation, financial management and closing processes. The Council will consider a report from the S151 Officer on the adequacy of the reserves in the annual budget-setting process. The report will contain estimates of reserves where necessary. The Audit Committee will consider actual reserves when approving the statement of accounts each year.

5.2. The following matters apply to individual reserves:

- The General Fund working balance will not fall below £20 million without the approval of The Council.
- The Capital Expenditure Reserve is applied to meet future investment plans and is available either to fund investment directly or to support other financing costs. The reserve can also be used for preliminary costs of capital schemes e.g. feasibility.
- The Parking Reserve will be applied to purposes for which there are specific statutory powers. This is broadly defined as transport and environmental improvements (the latter as defined in the Traffic Management Act 2004).
- The Schools Reserve, the Insurance Reserve, and the Barkantine (PFI Reserve) are clearly defined and require no further authority for the financing of relevant expenditure.

5.3. The Council will review the Reserves Policy on an annual basis.

## **Appendix 6**

# **RISK EVALUATION**

Risks	Budget Exposure	2018-19 Onwards	
		Medium Risk	High Risk
	£m	£m	£m
<b>General Economic Climate</b>			
Inflation	272	2.7	5.4
Tax base	230	2.3	4.6
Fees and charges	36	0.4	0.7
Grant funding (exc. ring fenced grants)	95	1.0	1.9
Fraud	0	0.5	1.0
<b>Service Demand (inc. ring fenced grants)</b>			
Children's Services	107	1.1	2.1
Adult Services	105	1.1	2.1
Demographics	100	2.0	4.0
Welfare Reform	0	1.7	5.0
Public Health transfer	36	0.4	0.7
<b>Savings programme</b>			
Slippage and non-achievement of savings	36	3.6	5.4
Cost of implementation	20	2.0	4.0
<b>Unidentified risks</b>	0	3.0	5.0
<b>TOTAL RISK EVALUATION</b>		<b>21.6</b>	<b>42.1</b>

## **Appendix 7**

# **PROJECTED MOVEMENT IN RESERVES**

**Projected Movement in Reserves April 2017 to March 2021**

**Appendix 7**

	<b>31-03-2017</b>	<b>31-03-2018</b>	<b>31-03-2019</b>	<b>31-03-2020</b>	<b>31-03-2021</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
<b>General Fund Reserve</b>	31.7	32.3	26.7	25.9	26.2
<b>Earmarked Reserves</b>					
Insurance	20.8	20.8	20.8	20.8	20.8
New Civic Centre	20.0	19.0	9.0	0.0	0.0
Parking Control	3.3	3.3	3.3	3.3	3.3
Transformation Reserve	25.0	19.2	12.5	6.9	1.6
ICT Reserve	23.1	20.0	15.0	10.0	5.0
Mayor's Tackling Poverty Reserve	5.0	4.0	2.3	0.7	0.0
Free School Meals Reserve	6.0	4.0	2.0	0.0	0.0
Mayor's Priority Investment Reserve	10.0	6.9	4.0	1.3	0.0
Risk Reserve	10.5	10.5	6.4	5.7	5.3
New Homes Bonus	7.3	1.3	1.3	1.3	1.3
Services Reserve	3.7	2.7	1.7	1.7	1.7
<b>Other Reserves</b>					
Housing Revenue Account	39.1	51.4	59.7	23.9	12.3
Schools	24.7	24.7	24.7	24.7	24.7
<b>Capital</b>					
Capital grants unapplied	82.0	77.0	74.0	74.0	74.0
Capital Receipts reserve	156.8	151.8	146.8	141.8	28.4
Major Repairs Reserve	9.5	9.5	9.5	9.5	9.5
	<b>469.0</b>	<b>449.0</b>	<b>410.2</b>	<b>341.9</b>	<b>204.5</b>



## **Appendix 8**

# **HOUSING REVENUE ACCOUNT**

## MEDIUM TERM FINANCIAL PLAN 2018-19 – 2022-23

## INDICATIVE HRA BUDGETS

Housing Revenue Account	2018-19	2019-20	2020-21	2021-22	2022-23
	Draft Budget £'000	Draft Budget £'000	Draft Budget £'000	Draft Budget £'000	Draft Budget £'000
<b>INCOME</b>					
Dwelling & non dwelling rents	(68,790)	(68,935)	(71,396)	(72,781)	(73,818)
Tenant & Leaseholder service charges	(20,842)	(21,446)	(22,002)	(22,442)	(22,928)
General Fund contributions	(115)	(115)	(115)	(115)	(115)
<b>GROSS INCOME</b>	(89,747)	(90,496)	(93,514)	(95,339)	(96,861)
<b>EXPENDITURE</b>					
Repairs & Maintenance	22,719	23,041	23,496	23,856	24,293
Supervision & Management	25,167	25,021	25,244	25,373	25,397
Special Services, Rents rates & taxes	15,732	15,797	15,284	15,467	15,654
Increased/(Decrease) provision for bad debts	600	700	700	700	700
Capital Financing charges	18,530	18,589	19,347	20,597	21,330
Sale of High Value Voids levy	0	8,400	8,820	9,261	9,724
<b>GROSS EXPENDITURE</b>	82,746	91,548	92,891	95,254	97,099
<b>NET COST OF HRA SERVICES</b>	(7,001)	1,052	(623)	(85)	238
Investment Income received	(1,240)	(692)	(470)	(378)	(316)
<b>Appropriations</b>					
Revenue Contribution to Capital Outlay (RCCO)	0	35,450	12,700	0	0
<b>NET POSITION</b>	(8,241)	35,810	11,607	(463)	(78)
<b>Balances</b>					
Opening balance	(54,278)	(62,519)	(26,709)	(15,102)	(15,565)
(Surplus)/ Deficit on HRA	(8,241)	35,810	11,607	(463)	(78)
<b>Closing balance</b>	(62,519)	(26,709)	(15,102)	(15,565)	(15,643)

## INDICATIVE THH HOUSING CAPITAL PROGRAMME 2018-19 – 2022-23

Budget Areas	2018-19 (£'000)	2019-20 (£'000)	2020-21 (£'000)	2021-22 (£'000)	2022-23 (£'000)
Better Neighbourhoods Programme	13,547	16,534	15,346	11,577	10,372
Fire Safety	7,265	8,909	5,107	3,875	1,672
Estate Improvements/Curtilage	100	100	100	100	100
Lifts	3,041	2,747	3,155	3,119	2,960
Door Entry	2,100	915	2,025	2,423	75
Door Entry New Install (G/Floor)	750	750	-	-	-
Mechanical (Boosted Water, Communal Vents, Water Tanks)	350	350	350	350	350
Communal Heating	1,000	3,007	3,030	2,086	1,035
Electrical Heat metering	100	100	100	100	100
Aerials/IRS	90	90	90	90	90
Planned Domestic Boiler Replacement	1,467	1,467	1,467	1,467	1,467
Emergency Domestic Boilers	200	200	200	200	200
Compliance Surveys	200	100	50	50	50
Communal Play Areas	50	50	50	50	50
Capitalised Voids	1,450	1,450	1,450	1,450	1,450
Aids & Adaptations	500	500	500	500	500
Overcrowding Initiatives	100	100	100	100	100
Contingency	500	500	500	500	500
Project Management fees	3,636	3,636	3,636	3,636	3,636
<b>Total</b>	<b>36,446</b>	<b>41,504</b>	<b>37,255</b>	<b>31,672</b>	<b>24,706</b>
Over Programming (30%)	(10,934)	(12,452)	(11,177)	(9,502)	(7,412)
<b>Revised Total</b>	<b>25,512</b>	<b>29,054</b>	<b>26,079</b>	<b>22,171</b>	<b>17,295</b>

## **Appendix 9**

# **CAPITAL PROGRAMME**

Scheme Description	Programme	Strategic Priority Outcome	Priority Areas for Capital Investments	2017-18 Budget £m	2018-19 Budget £m	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget £m	2023-24 Budget £m	2024-25 Budget £m	2025-26 Budget £m	2026-27 Budget £m	2027-28 Budget £m	2017-18 to 2027-28 Total Budget £m
<b>Health, Adults &amp; Community</b>															
Telecare/Telehealth Equipment	Tele Care/Telehealth Equipment	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.097											0.097
Occupational Therapy Suite	Occupational Therapy Suite	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.001											0.001
Aberfeldy Practice - Improvements to Health Infrastructure	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	-			1.400	1.600							3.000
Andrew Street - Reduce Tarmac & Paving	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.240											0.240
Bow School - Landscaping & Create Access	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.283											0.283
Buxton Street East - Tree Planting and Park Entrance	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.240											0.240
Buxton Street West - Landscaping	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.200											0.200
Goodmans Fields - Improvements to Health Infrastructure	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	-	0.245	2.827	0.337								3.409
Sutton Wharf - Improvements to Health Infrastructure	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.229	2.305	0.585									3.119
Various Sites - Improvement Works	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	1.051											1.051
William Cotton Place - Fit Out	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.978											0.978
Redcoat Youth Centre - Vibrance Relocation	Condition	1.3 People access joined-up services when they need them and feel healthier and independent	Council Owned Buildings	0.004											0.004
<b>Health, Adults &amp; Community Total</b>				<b>3.322</b>	<b>2.550</b>	<b>3.412</b>	<b>1.737</b>	<b>1.600</b>	-	-	-	-	-	-	<b>12.621</b>
<b>Children's Services</b>															
Arnhem Wharf - Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.007											0.007
Bow Primary School SEN Provision and PRU	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	-	1.100	2.500	2.500	1.500	1.500						9.100
Bow School - Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.466											0.466
George Green's - 6th form Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.100	0.200	4.570	0.130								5.000
Langdon Park - 6th Form Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.090	0.190	3.610	0.110								4.000
London Dock - Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education - Secondary	0.650		1.879	1.114								3.643
Millharbour Priamry School	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	-			0.300	3.950							4.250
Olga Primary School Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	1.493	0.108										1.601
Raines Foundation School	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	1.260	0.300	2.000	0.440								4.000
St Paul's Way Trust School Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	3.677	1.469										5.146
Stebon Expansion Scheme	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.031											0.031

Scheme Description	Programme	Strategic Priority Outcome	Priority Areas for Capital Investments	2017-18 Budget £m	2018-19 Budget £m	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget £m	2023-24 Budget £m	2024-25 Budget £m	2025-26 Budget £m	2026-27 Budget £m	2027-28 Budget £m	2017-18 to 2027-28 Total Budget £m
Stepney - 6th Form Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	3.492											3.492
Various - Scheme Development	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.400											0.400
Westferry Secondary School	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education - Secondary	-	0.200	0.500	1.300	1.000							3.000
Wood Wharf Primary School	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.090		0.225	3.475	1.000	0.210						5.000
Woolmore Primary School Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.005											0.005
Arnhem Wharf Primary - Urgent Lift Works	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.019											0.019
Bangabandhu Primary School - Re-roofing Phase 2	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.260											0.260
Ben Jonson - Phoenix Classes	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.150											0.150
Ben Jonson Primary - Hygiene Room	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.001											0.001
Blue Gate Fields Infants School - Roofing Phase 1	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.019											0.019
How Secondary School	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education - Secondary	-	1.500	1.500									3.000
How Secondary School - 6th Form Extension	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.200											0.200
Howley Hall - Brickworks	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.055											0.055
Canon Barnett - Boiler Replacement	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.035											0.035
Canon Barnett - Boiler Replacement Phase 2	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.001											0.001
Cherry Tree Special Needs Primary School- Replace hot and cold water system	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.035											0.035
Cubitt Town - Boundary Wall Phase 2	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.030											0.030
Cubitt Town Primary - Accessibility Improvements	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.007											0.007
Cubitt Town Primary - Replace Boundary Wall	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.014											0.014
Eva Armsby - Improvement Works	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.015											0.015
Globe Primary School - Replace Heating & Hot Water Boilers	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.165											0.165
Hague Primary - Replace Gas fired hot water boilers	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.025											0.025
Halley Primary - Replace boilers	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.080											0.080
Halley Primary School - Gate works	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.012											0.012
Halley Primary School - Replace Distribution Boards	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.030											0.030

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Harbinger School - Brickwork	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.059											0.059
Harpley School - Urgent Lift Works	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.028											0.028
Harry Gosling - Feasibility	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.005											0.005
Harry Roberts Nursery School - Water main replacement	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.015											0.015
Hermitage Primary - Hygiene Room	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.031											0.031
Hermitage Primary School - Replace Hot Water Boilers	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.105											0.105
Hermitage Primary School - Re-roofing Phase 2	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.200											0.200
Ian Mikardo High Special Needs School - Roofing	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.052											0.052
John Scurr Primary- Hygiene Rooms	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.032											0.032
John Scurr Primary School - Fire Alarm Upgrade	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.060											0.060
Langdon Park - 6th Form Accommodation	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.006											0.006
Marion Richardson - Site Security Works	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.001											0.001
Marner - Re-roofing Phase 2	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.210											0.210
Marner Primary - Foul Smell Invoice	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.022											0.022
Marner Primary School - Sports Pitch	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.186											0.186
Match funding for schools	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.029											0.029
Morpeth Secondary School - Structural Works to Wessex Centre	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education - Secondary	0.118											0.118
Oaklands Secondary School - Water Tanks	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education - Secondary	0.037											0.037
Oaklands Secondary School - Works and Upgrade to Passenger Lift	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education - Secondary	0.040											0.040
Osmani - Structural Works	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.035											0.035
PFI Schools - Asbestos Removal	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.262											0.262
PFI schools - Various - Urgent Works	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.965											0.965
Programme Development	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.001											0.001
Programme Development 2017-18	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.250											0.250
Smithy Street School - Lead Pipework Replacement	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.030											0.030

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St Luke's Hygiene Room	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.015											0.015
Stebon Primary School - Pool Hoist	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.022											0.022
Stephen Hawking Special Needs Primary School - Building Alterations	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	3.937											3.937
Swanlea School - Fire Protection Works Phase 1 & 2	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education - Secondary	0.480											0.480
The Cherry Trees School - New Entrance & Family Support Facility	Conditions and Improvement	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Primary	0.221											0.221
Bishop Challoner - Community Facilities	Bishop Challoner	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Other	-			0.590								0.590
Barnardos	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.079											0.079
Bethnal Green Gardens	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.050											0.050
City Gateway - Gateway Tots	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.051											0.051
Date Palm Primary	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.005											0.005
Postic Walk - Integrated Early Years' Service	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.077											0.077
Mile End Road	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.039											0.039
Provision for 2 year olds - Whitehorse One O'clock Club	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.030											0.030
Provisions - Statutory Duty	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	1.007											1.007
Shining Futures	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.024											0.024
St Matthias Community Play Centre	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.038											0.038
Weavers Field Pre-School	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.019											0.019
Winterton House Phase 2	Provision for 2 year olds	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.008											0.008
Albert Gardens	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.013											0.013
Bartlett Park - Playground activity	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.245	0.245										0.490
Bartlett Park Landscape Improvement Project	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	2.470	0.726										3.196
Bromley By Bow Recreation Ground	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.012											0.012
Cavell Street Gardens	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.100	0.100										0.200
Cemetery Park Lodge (Phase 2)	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.102											0.102
Christ Church Gardens	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	-		0.534									0.534
King Edward Memorial Park	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.192											0.192
King Edward Memorial Park	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.007	0.096	0.644	2.019	0.501							3.267
Poplar Park	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.042											0.042
Poplar Park & Jolly's Green	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.033											0.033



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The Oval Space	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.158	0.040										0.198
Tree planting - Isle of Dogs	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.032											0.032
Trinity Square Gardens	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.023											0.023
Victoria Park Lodges	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.120	0.028										0.148
Victoria Park Sports Hub	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.019											0.019
Warner Green	Parks	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.024	0.024										0.048
Four Outdoor / Urban Gyms	Mayor's Priority - Parks and Open Spaces	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.017	0.173	0.010									0.200
Brick Lane Mural	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.043											0.043
Ford Square	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	-	0.139										0.139
John Orwell Sports Centre Astro-turf Development	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.010											0.010
Langdon Park BMX	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.050											0.050
Leisure Centre Improvements	Culture	1.3 People access joined-up services when they need them and feel healthier and independent	Leisure Provision	-	1.000	0.500									1.500
Middlesex Street	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.119	0.120										0.238
Mile End Stadium Astro-turf Development	Culture	1.3 People access joined-up services when they need them and feel healthier and independent	Leisure Provision	0.233											0.233
Pocket Parks Project A12 Green Mile	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.030											0.030
Pocket Parks Project Chicksand East	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.048											0.048
Pocket Parks Project Marner Family	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.017	0.017										0.034
Pocket Parks Project Ropewalk Gardens	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.038											0.038
Handy Park	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	-	0.050										0.050
Victoria Park - Pools Playground Improvement	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.074											0.074
Wapping Dock Realm Improvements	Culture	2.1 People live in a borough that is clean and green	Leisure Provision	0.046											0.046
<b>Children's Services Total</b>				<b>26.115</b>	<b>7.824</b>	<b>18.473</b>	<b>11.978</b>	<b>7.951</b>	<b>1.710</b>	-	-	-	-	-	<b>74.051</b>

Place															
Private Sector Improvement Grants	Private Sector Improvement Grants	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	0.030	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.020	0.950
Disabled Facilities Grants	Disabled Facilities Grants	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	1.417	1.257	1.257									3.931
DDA Related Access Works	Facilities Management - DDA works	3.0 A focussed and efficient Council co-producing excellent services	Council Owned Buildings	0.052											0.052
30 Challoner Walk	Community Hubs/Buildings	1.4 Inequality is reduced and people live in a cohesive community	Council Owned Buildings	0.735											0.735
Community Hubs/Buildings	Community Hubs/Buildings	1.4 Inequality is reduced and people live in a cohesive community	Council Owned Buildings	0.010											0.010
Granby Hall Community Hub	Community Hubs/Buildings	1.4 Inequality is reduced and people live in a cohesive community	Council Owned Buildings	0.020	0.880										0.900
Raine House Wapping Community Centre	Community Hubs/Buildings	1.4 Inequality is reduced and people live in a cohesive community	Council Owned Buildings	0.050	0.300	0.950									1.300
St. Andrews Community Centre	Community Hubs/Buildings	1.4 Inequality is reduced and people live in a cohesive community	Council Owned Buildings	0.020											0.020
TRAMSHED Digby Greenway Community Centre	Community Hubs/Buildings	1.4 Inequality is reduced and people live in a cohesive community	Council Owned Buildings	0.020											0.020
Barley Mow Project	S106 Schemes	2.1 People live in a borough that is clean and green	Other	0.014											0.014
Bow TfL	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.307											0.307
Brick Lane Regeneration	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.639											0.639
Bus Initiative	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.060											0.060

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Carbon offsetting	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.305	0.305										0.610
Commercial Road	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.060	0.060										0.120
Crossharbour	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.080											0.080
Dora Hall and Cheadle Hall	S106 Schemes	2.1 People live in a borough that is clean and green	Council Owned Buildings	0.004											0.004
Millennium Quarter Public Art Project	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	-	0.087										0.087
Roman Road Regeneration Programme	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.168											0.168
Stepney City Farm Visitor Experience Improvements Project	S106 Schemes	2.1 People live in a borough that is clean and green	Leisure Provision	0.010											0.010
Stepney City Farm Water Efficiency Project	S106 Schemes	2.1 People live in a borough that is clean and green	Leisure Provision	0.025											0.025
Stepney Farm	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.122											0.122
TfL Cycle Hire	S106 Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.060											0.060
Whitechapel Delivery: Creating Open Spaces – Phase 1	S106 Schemes	2.1 People live in a borough that is clean and green	Parks and Open Spaces	0.070	0.070										0.140
Whitechapel Early Win Project	S106 Schemes	2.1 People live in a borough that is clean and green	Markets and High Street Improvements	0.053											0.053
Hackney Wick	Section 106 Passported Funding	2.1 People live in a borough that is clean and green	Other	1.000											1.000
Silvocea Way	Section 106 Passported Funding	2.1 People live in a borough that is clean and green	Other	0.025	0.025										0.050
St Katherine's Dock Practice	Section 106 Passported Funding	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	0.009											0.009
Wellington Way Health Centre	Section 106 Passported Funding	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities	1.148	3.340	0.125									4.613
Purchase of properties for use as temporary / affordable accommodation	Purchase of Properties for use as temporary / affordable accommodation	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	7.430	9.300	24.970	32.400	12.400	10.400	3.100					100.000
Purchase of properties for use as temporary accommodation	Purchase of Properties for use as temporary accommodation	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	46.505	-										46.505
10 Turin Street	Conversion of council buildings to temporary accommodation	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	0.010											0.010
Bethnal Green Cottage	Conversion of council buildings to temporary accommodation	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	0.208	0.063										0.270
Conversion of council buildings to temporary accommodation	Conversion of council buildings to temporary accommodation	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	0.300											0.300
Thomas Buxton PM Cottage	Conversion of council buildings to temporary accommodation	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	0.045											0.045
HRA - Indicative Schemes – RP Grant Scheme	Registered Provider Grant Scheme (from 1-4-1)	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	-	1.603										1.603
RP Grant Scheme - ARHAG Housing Association	Registered Provider Grant Scheme (from 1-4-1)	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	0.200	0.271										0.471
RP Grant Scheme - East End Homes	Registered Provider Grant Scheme (from 1-4-1)	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	0.257	0.350	0.350									0.957
RP Grant Scheme - Family Mosaic	Registered Provider Grant Scheme (from 1-4-1)	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	0.295	0.864										1.159
RP Grant Scheme - Peabody	Registered Provider Grant Scheme (from 1-4-1)	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	1.940											1.940
Thriving High Streets Programme	Thriving High Streets Pilot Programme	2.1 People live in a borough that is clean and green	Markets and High Street Improvements	0.200	0.800										1.000
PLACE - Indicative Schemes - Establish a Wholly Owned Company	Establish a Wholly Owned Company	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	6.000											6.000
PLACE - Indicative Schemes - Establish a Community Benefit Society	Establish a Community Benefit Society	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	2.500											2.500
PDC 229 Bethnal Green Rd	PDC 229 Bethnal Green Road	3.0 A focussed and efficient Council co-producing excellent services	Council Owned Buildings	1.670											1.670
ICT Infra - Beatrice Tate	BSF ICT Infrastructure	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	ICT Investments	0.041											0.041
ICT Infra - Swanlea	BSF ICT Infrastructure	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	ICT Investments	0.149											0.149
ICT Infra- Harpley PRU	BSF ICT Infrastructure	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	ICT Investments	0.063											0.063
ICT Infra- Oaklands	BSF ICT Infrastructure	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	ICT Investments	0.149											0.149

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ICT Infr-Cent Foundation	BSF ICT Infrastructure	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	ICT Investments	0.299											0.299
ICT Infr-Sir John Cass	BSF ICT Infrastructure	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	ICT Investments	0.276											0.276
"No entry except or cyclists" on existing one-way streets	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.005											0.005
Aldgate Connections	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.413											0.413
Belgrave Street	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.061											0.061
Ben Johnson Neighbourhood	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.296	0.200										0.496
Bow	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.136											0.136
Bridge Assessment & Strengthening	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.141											0.141
Bus Priority	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.050											0.050
Bus Priority Delivery - Cambridge Heath Road and Hackney Road	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.037											0.037
Bus Stop Accessibility Prog	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.040											0.040
Central London Grid Hackney Road – Boundary Road Cycle route	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.100											0.100
Chrisp St Corridor	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.300	0.150										0.450
Corbridge Crescent Bridge	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.038											0.038
Cycle Parking	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.153											0.153
Cycle Safety Hotspots	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.387	-										0.387
Cycle Strategy 2017	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.350											0.350
EV charging point feasibility	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.059											0.059
Green Grid	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.050											0.050
Greenway Quietway Route: Crown Close	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.100											0.100
Greenway Quietway Route: Implementation fee	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.010											0.010
Greenway Quietway Route: Wick Lane / Jodrell Road	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.100											0.100
Greenway Quietway Route: Wick Lane / Monier Road Underpass	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.150											0.150
Hackney Road to Calvert Avenue	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.054											0.054
Healthy Streets audits and design: Cotton St / Prestons Rd / West India Dock Rd	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.041											0.041
Historic Streets	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.271	0.050										0.321
Housing Zone – Complementary Measures	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.240	-										0.240
Housing Zone (GLA)	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.150	0.250										0.400
LED Bridge Height sign replacement	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.113											0.113
Legible London - TfL Corridors, neighbourhoods	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.033											0.033
Legible London 2017	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.075											0.075
LIP 3 Development	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.020											0.020
Local Accessibility	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.060											0.060
Manchester Road - Between Pelevna Street and Marsh Wall Junction	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.007											0.007
Motor Cycle Parking	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.010											0.010
Motor Cycles in Bus Lanes	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.005											0.005
Principal Road Network - Bethnal Green Road - Braithwaite & Buckfast	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.281											0.281

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Scheme Description	Programme	Strategic Priority Outcome	Priority Areas for Capital Investments	2017-18 Budget £m	2018-19 Budget £m	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget £m	2023-24 Budget £m	2024-25 Budget £m	2025-26 Budget £m	2026-27 Budget £m	2027-28 Budget £m	2017-18 to 2027-28 Total Budget £m
Quietway 6: Arbury Road / Grove Road	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.045											0.045
Quietway 6: Bancroft Road / Warley Street	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.197											0.197
Quietway 6: Cadogan Place	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.003											0.003
Quietway 6: Gladstone Place / Galahad Mews	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.037											0.037
Quietway 6: Hepscott Road / Wallis Road	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.054											0.054
Quietway 6: Holton Street / Grantley Street	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.011											0.011
Quietway 6: Implementation fee	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.030											0.030
Quietway 6: Meath Gardens/Walter Street	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.002											0.002
Quietway 6: Mile End Park	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.007											0.007
Quietway 6: Old Ford Road / Armagh Road	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.143											0.143
Quietway 6: Parnell Road / Jodrell Road	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.096											0.096
Quietway 6: Roman Road / Cardigan Road / Arbery Road	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.003											0.003
Quietway 6: Sycamore Avenue / Cedar Close	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.012											0.012
Road Safety 2017	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.300											0.300
Rothbury Road - Full Length	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.005											0.005
Sustainable Drainage Scheme	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.031											0.031
Sydney Street	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.121											0.121
Tackling ASB Driving	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.050											0.050
TfL LIP to be Allocated	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	-	1,450	2,435	1,015								4,900
TfL Local Transport - Various	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.011											0.011
Wentworth Street	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.094											0.094
Zebra crossing halos (TfL C/N)	TfL Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.038											0.038
Garnet Street - Bridge Painting	Public Realm Improvements	2.1 People live in a borough that is clean and green	Other	0.024											0.024
Interim Depot Strategy	Public Realm Improvements	3.0 A focussed and efficient Council co-producing excellent services	Other	0.483											0.483
Petticoat Lane Market Improvements	Public Realm Improvements	2.1 People live in a borough that is clean and green	Markets and High Street Improvements	0.039	0.038										0.077
Streetlighting Replacement	Public Realm Improvements	2.1 People live in a borough that is clean and green	Other	0.300	3,000	4,000	4,000	3,700							15,000
Silvertown Planning Performance	Public Realm Improvements	2.1 People live in a borough that is clean and green	Other	0.060											0.060
100 Violet Road - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	-	0.031										0.031
100 Whitechapel Road - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.050											0.050
101-109 Fairfield Road	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.009	0.009										0.018
136-140 Wapping High Street - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.048	0.049										0.097
15 - 17 Leman Street - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.007	0.006										0.013
154-160 Hackney Road - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.024											0.024
16-23 Salter Street	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.011	-										0.011
21 Wapping Lane	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.288											0.288
221 Burdett Road - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	-	0.010										0.010
32-42 Bethnal Green Road	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.025	-										0.025
397-411 Westferry Road	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.005	0.005										0.010

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60 Commercial Road - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.002	0.062	0.094									0.158
744 Wick Lane & 46-52 Fairfield Road	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.040											0.040
86 Brick Lane - Towards traffic management and calming measures on Fournier Street	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.058	0.058										0.116
Aldgate Place	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.291	0.292										0.583
Blackwall Way Bus Stops	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.024											0.024
Caspian Wharf and 1-3 Yeo St	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.094											0.094
Caspian Works and Lewis House	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.016	-										0.016
Cavell Street	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.067											0.067
Additional S106 schemes	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.180											0.180
Cycling and Pedestrian Improvements Programme	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	-	-	-	-	0.522							0.522
Construction of a pedestrian crossing on East Ferry Road, located near school entrance	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.017	0.017										0.034
Cuba St, Manilla St, Tobago St and Byng St	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.204											0.204
Former London Arena Phase 2	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.025	-										0.025
Fulneck 150 Mile End Road	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.044	0.045										0.089
Gem House	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.075	0.075										0.150
Improvements to pedestrian and cycle routes	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.010											0.010
Land Adjacent to Repton Street - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.009											0.009
Popold Estate, Bow Common Lane, St Pauls Way & Burdett Road - Phase 8 - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	-		0.037									0.037
Timehouse Cut / St Annes Row	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.026	-										0.026
London Fruit and Wool - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.039											0.039
Marsh Wall Environmental Improvement	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.014	0.014										0.028
Millwall Docks - Open space improvements	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.057	0.057										0.114
Morris Rd & Rifle St	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.002											0.002
North Dock IOD Cross rail Station - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.010	0.117										0.127
North West Corner of Chrisp Street and Carmen Street	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.010	0.010										0.020
Ocean Estate FS2	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.048	0.048										0.096
One-Way to Two-Way Cycle Streets - Alie Street Area	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.101	0.101	0.101	0.101								0.405
Prestons Road	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.090											0.090
Sale Street	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.080											0.080
Spindrift Avenue	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.080											0.080
Stonebridge Wharf (Landscape Improvements)	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.089											0.089
Suttons Wharf, Palmers Road - Cycle and Pedestrian Improvement Project 2017	Transport S106 Funded Schemes	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.050											0.050
Fairfield Rd/Tredegar Rd Signa	OPTEMS	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.011											0.011
Tredegar Road	OPTEMS	2.1 People live in a borough that is clean and green	Roads and Transport Infrastructure	0.079	0.030										0.109
PSI Handhelds	ICT Solution - Handheld Devices	3.0 A focussed and efficient Council co-producing excellent services	Other	0.424											0.424
Adelina Grove	Contaminated Land Works	2.1 People live in a borough that is clean and green	Other	0.021											0.021
Contaminated Land Strategy H&S	Contaminated Land Works	2.1 People live in a borough that is clean and green	Other	0.050		0.106	0.106								0.262
Copton Close (Watts Gr/Gale St)	Contaminated Land Works	2.1 People live in a borough that is clean and green	Other	0.016											0.016

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Poplar High St (Contaminated Land Surveys)	Contaminated Land Works	2.1 People live in a borough that is clean and green	Other	0.015											0.015
Rosebank Gardens	Contaminated Land Works	2.1 People live in a borough that is clean and green	Other	0.013											0.013
Stores Quay	Contaminated Land Works	2.1 People live in a borough that is clean and green	Other	0.019											0.019
Veronica House	Contaminated Land Works	2.1 People live in a borough that is clean and green	Other	0.014											0.014
Bancroft Library	Investment works to LBTH Assets	3.0 A focussed and efficient Council co-producing excellent services	Council Owned Buildings	0.050	0.095										0.145
Bethnal Green Library	Investment works to LBTH Assets	3.0 A focussed and efficient Council co-producing excellent services	Council Owned Buildings	0.200	0.400										0.600
CCTV Improvements	CCTV	2.3 People live in safer neighbourhoods and anti-social behaviour is tackled	Other	0.135											0.135
Improving Air quality in Tower Hamlets	PLACE - Mayoral Priority Growth 2017-18 to 2019-20	2.1 People live in a borough that is clean and green	Other	0.050	0.050	-									0.100
Investing in public realm to improve the local environment for residents	PLACE - Mayoral Priority Growth 2017-18 to 2019-20	2.1 People live in a borough that is clean and green	Parks and Open Spaces	1.000	1.000	1.000									3.000
<b>Place Total</b>				<b>86.001</b>	<b>27.392</b>	<b>35.526</b>	<b>37.722</b>	<b>16.722</b>	<b>10.500</b>	<b>3.200</b>	<b>0.100</b>	<b>0.100</b>	<b>0.100</b>	<b>0.020</b>	<b>217.383</b>

<b>Resources</b>															
Idea Store Interactive Learning Project	Idea Store	3.0 A focussed and efficient Council co-producing excellent services	Council Owned Buildings	0.218											0.218
Idea Store Learning Technology Refresh	Idea Store	3.0 A focussed and efficient Council co-producing excellent services	ICT Investments	0.149											0.149
Providing free Wi-Fi in Tower Hamlets for all	RESOURCES - Mayoral Priority Growth 2017-18 to 2019-20	1.4 Inequality is reduced and people live in a cohesive community	ICT Investments	-	0.500	0.500	0.500								1.500
<b>Resources Total</b>				<b>0.367</b>	<b>0.500</b>	<b>0.500</b>	<b>0.500</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1.867</b>

<b>Corporate</b>															
Civic Centre Project - pre-procurement detailed design phase	Whitechapel Civic Centre	3.0 A focussed and efficient Council co-producing excellent services	Council Owned Buildings	3.270	0.500										3.770
Civic Centre	Whitechapel Civic Centre	3.0 A focussed and efficient Council co-producing excellent services	Council Owned Buildings	0.673	8.763	51.324	42.719	1.521							105.000
Infrastructure Delivery Budgetary Provision	Infrastructure Delivery Budgetary Provision	3.0 A focussed and efficient Council co-producing excellent services	Other	6.415											6.415
Underground Refuse Service - to replace two vehicles at the end of their useful life	CORP - Indicative Schemes - Other	2.1 People live in a borough that is clean and green	Other	-	0.500										0.500
<b>Corporate Total</b>				<b>10.359</b>	<b>9.763</b>	<b>51.324</b>	<b>42.719</b>	<b>1.521</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>115.686</b>

<b>Housing Revenue Account</b>															
Housing Capital Programme	Housing Capital Programme	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – Maintenance and Upkeep of Existing Stock	41.724	25.480	29.050	26.040	22.190	17.290						161.774
Ocean Retail Units	Ocean Estate Regeneration	2.1 People live in a borough that is clean and green	Markets and High Street Improvements	0.866											0.866
Blackwall Reach	Blackwall Reach	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	2.748	1.152										3.900
Fuel Poverty Works – Bancroft & Avebury	Fuel Poverty Works	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	0.040	0.400										0.440
Bradwell Street - GLA Pipeline Fund	New Supply - On site	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	0.017											0.017
Extensions - GLA Pipeline Fund	New Supply - On site	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	1.206											1.206
Watts Grove - GLA Pipeline	New Supply - On site	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	3.016											3.016
99 St Paul's Way 1-4-1 Receipts	New Supply - Pre construction	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	0.061											0.061
Arnold Road - 1-4-1 receipts	New Supply - Pre construction	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	0.600	1.000	4.000	4.000	4.000	2.000						15.600
Ashington Estate East - GLA Pipeline Fund	New Supply - Pre construction	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	0.100	2.000	4.000	4.000	4.000	3.400						17.500
Baroness Rd - 1-4-1 receipts	New Supply - Pre construction	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	0.600	4.000	3.000	4.000	0.500							12.100
Hereford St - 1-4-1 receipts	New Supply - Pre construction	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	-		1.500	3.000	3.000	3.000	1.000					11.500
Jubilee St - 1-4-1 receipts	New Supply - Pre construction	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	0.600	4.000	3.000	4.000	0.500							12.100
Locksley Estate - 1-4-1 receipts	New Supply - Pre construction	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	0.600	3.000	4.000	4.000	0.500							12.100
Tent Street - 1-4-1 receipts	New Supply - Pre construction	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	0.600		2.000	4.000	4.000	4.000						14.600

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Pipeline Schemes - Preliminary Works	Pipeline Schemes (1-4-1)	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	2.170	1.130										3.300
HRA - Indicative Schemes - New Supply	New Supply - Budget Provision	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – New Build	-	-	4.000	4.000	4.000	4.000	4.000	3.092				23.092
Community Benefit Society - 1-4-1 receipts	Community Benefit Society - 1-4-1 receipts	2.2 People live in good quality and affordable homes and neighbourhoods	Housing	-	4.500										4.500
Short Life Properties	Short Life Properties	2.2 People live in good quality and affordable homes and neighbourhoods	Housing – Maintenance and Upkeep of Existing Stock	0.176											0.176
Introducing new off-street parking arrangements in our housing estates due to changes in national legislation	HRA - Mayoral Priority Growth 2017-18 to 2019-20	2.1 People live in a borough that is clean and green	Other	0.200	0.500	1.300	1.300								3.300
<b>Housing Revenue Account Total</b>				<b>55.322</b>	<b>47.162</b>	<b>55.850</b>	<b>58.340</b>	<b>42.690</b>	<b>33.690</b>	<b>5.000</b>	<b>3.092</b>	-	-	-	<b>301.146</b>
<b>Total Current Capital Programme 2017-18 to 2027-28</b>				<b>181.487</b>	<b>95.192</b>	<b>165.084</b>	<b>152.996</b>	<b>70.484</b>	<b>45.900</b>	<b>8.200</b>	<b>3.192</b>	<b>0.100</b>	<b>0.100</b>	<b>0.020</b>	<b>722.756</b>

Scheme Description	Programme	Strategic Priority Outcome	Priority Areas for Capital Investments	2017-18 Budget £m	2018-19 Budget £m	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget £m	2023-24 Budget £m	2024-25 Budget £m	2025-26 Budget £m	2026-27 Budget £m	2027-28 Budget £m	Total Budget £m
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**Increases to existing schemes 2017-18 to 2027-28**

<b>Health, Adults &amp; Community</b>															
Goodmans Fields - Improvements to Health Infrastructure	Public Health	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities			1.415									1.415
<b>Health, Adults &amp; Community Total</b>				-	-	1.415	-	-	-	-	-	-	-	-	1.415

<b>Children's Services</b>															
St Paul's Way Trust School Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.300	0.200										0.500
Stepney - 6th Form Expansion	Basic Need/Expansion	1.2 Children and young people feel they are protected and get the best start in life and realise their potential	Education – Other	0.600											0.600
Four Outdoor / Urban Gyms	Mayor's Priority - Parks and Open Spaces	1.3 People access joined-up services when they need them and feel healthier and independent	Health Facilities			0.050									0.050
<b>Children's Services Total</b>				0.900	0.200	0.050	-	-	-	-	-	-	-	-	1.150

<b>Place</b>															
Private Sector Improvement Grants	Private Sector Improvement Grants	2.2 People live in good quality and affordable homes and neighbourhoods	Housing											0.080	0.080
Disabled Facilities Grants	Disabled Facilities Grants	2.2 People live in good quality and affordable homes and neighbourhoods	Housing		0.143	0.243	1.500	1.500							3.386
Granby Hall Community Hub	Community Hubs/Buildings	1.4 Inequality is reduced and people live in a cohesive community	Council Owned Buildings		0.120										0.120
RAMSHED Digby Greenway Community Centre	Community Hubs/Buildings	1.4 Inequality is reduced and people live in a cohesive community	Council Owned Buildings	0.040											0.040
Thomas Buxton PM Cottage	Conversion of council buildings to temporary accommodation	2.2 People live in good quality and affordable homes and neighbourhoods	Housing		2.300										2.300
Registered Provider Grant Scheme	Registered Provider Grant Scheme (from 14-1)	2.2 People live in good quality and affordable homes and neighbourhoods	Housing		1.407	1.919	1.500	0.174							5.000
Investing in Public Realm to improve the local environment for residents (Borough Refresh)	Mayoral Priority Growth 2017-18 to 2019-20	2.1 People live in a borough that is clean and green	Public Realm / Streets				1.000	1.000	1.000						3.000
<b>Place Total</b>				0.040	3.970	2.162	4.000	2.674	1.000	-	-	-	-	0.080	13.926

<b>Corporate</b>															
Underground Refuse Service - A third new Underground Refuse Vehicle (URS)		2.1 People live in a borough that is clean and green	Other			0.270									0.270
<b>Corporate Total</b>				-	-	0.270	-	-	-	-	-	-	-	-	0.270

<b>Total Increases to Existing Schemes 2017-18 to 2027-28</b>				0.940	4.170	3.897	4.000	2.674	1.000	-	-	-	-	0.080	16.761
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**New additions to capital programme**

<b>Corporate</b>															
Feasibility Studies	N/A	N/A	N/A		1.500										1.500
New Schemes	N/A	N/A	N/A		15.000										15.000
<b>Corporate Total</b>				-	16.500	-	-	-	-	-	-	-	-	-	16.500

<b>Total New additions to capital programme</b>				-	16.500	-	-	-	-	-	-	-	-	-	16.500
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<b>Total Increases to Existing Schemes 2017-18 to 2027-28 and New additions to capital programme</b>				0.940	20.670	3.897	4.000	2.674	1.000	-	-	-	-	0.080	33.261
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Capital Programme by Directorate

Directorate	2017-18 Budget £m	2018-19 Budget £m	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget £m	2023-24 Budget £m	2024-25 Budget £m	2025-26 Budget £m	2026-27 Budget £m	2027-28 Budget £m	2017-18 to 2027-28 Total Budget £m
Health, Adults & Community	3.322	2.550	4.827	1.737	1.600	-	-	-	-	-	-	14.036
Children's Services	27.015	8.024	18.523	11.978	7.951	1.710	-	-	-	-	-	75.201
Place	86.041	31.362	37.688	41.722	19.396	11.500	3.200	0.100	0.100	0.100	0.100	231.309
Resources	0.367	0.500	0.500	0.500	-	-	-	-	-	-	-	1.867
Corporate	10.359	26.263	51.594	42.719	1.521	-	-	-	-	-	-	132.456
<b>Total (Non HRA)</b>	<b>127.105</b>	<b>68.700</b>	<b>113.131</b>	<b>98.656</b>	<b>30.468</b>	<b>13.210</b>	<b>3.200</b>	<b>0.100</b>	<b>0.100</b>	<b>0.100</b>	<b>0.100</b>	<b>454.870</b>
Housing Revenue Account	55.322	47.162	55.850	58.340	42.690	33.690	5.000	3.092	-	-	-	301.146
<b>Total HRA</b>	<b>55.322</b>	<b>47.162</b>	<b>55.850</b>	<b>58.340</b>	<b>42.690</b>	<b>33.690</b>	<b>5.000</b>	<b>3.092</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>301.146</b>
<b>Total Budget</b>	<b>182.427</b>	<b>115.862</b>	<b>168.981</b>	<b>156.996</b>	<b>73.158</b>	<b>46.900</b>	<b>8.200</b>	<b>3.192</b>	<b>0.100</b>	<b>0.100</b>	<b>0.100</b>	<b>756.017</b>

Capital Programme by Strategic Priority Outcome

Strategic Priority Outcome	2017-18 Budget £m	2018-19 Budget £m	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget £m	2023-24 Budget £m	2024-25 Budget £m	2025-26 Budget £m	2026-27 Budget £m	2027-28 Budget £m	2017-18 to 2027-28 Total Budget £m
1.1 People access a range of education, training, and employment opportunities and feel they share the benefits from growth	-	-	-	-	-	-	-	-	-	-	-	-
1.2 Children and young people feel they are protected and get the best start in life and realise their potential	23.675	5.267	16.784	9.959	7.450	1.710	-	-	-	-	-	64.846
1.3 People access joined-up services when they need them and feel healthier and independent	4.728	7.063	5.512	1.737	1.600	-	-	-	-	-	-	20.640
1.4 Inequality is reduced and people live in a cohesive community	0.895	1.800	1.450	0.500	-	-	-	-	-	-	-	4.645
2.1 People live in a borough that is clean and green	17.995	11.154	10.522	9.541	5.723	1.000	-	-	-	-	-	55.935
2.2 People live in good quality and affordable homes and neighbourhoods	121.393	64.320	83.389	92.540	56.864	44.190	8.200	3.192	0.100	0.100	0.100	474.388
2.3 People live in safer neighbourhoods and anti-social behaviour is tackled	0.135	-	-	-	-	-	-	-	-	-	-	0.135
3.0 A focussed and efficient Council co-producing excellent services	13.605	9.758	51.324	42.719	1.521	-	-	-	-	-	-	118.927
N/A (Feasibility Studies, and New Schemes)	-	16.500	-	-	-	-	-	-	-	-	-	16.500
<b>Total Budget</b>	<b>182.427</b>	<b>115.862</b>	<b>168.981</b>	<b>156.996</b>	<b>73.158</b>	<b>46.900</b>	<b>8.200</b>	<b>3.192</b>	<b>0.100</b>	<b>0.100</b>	<b>0.100</b>	<b>756.017</b>

Capital Programme Funding

Directorate	Capital Grants £m	Major Repairs Allowance £m	Schools Contribution £m	Capital Receipts £m	Prudential Borrowing £m	S106 / Community Infrastructure Levy £m	Revenue £m	Total Funding £m
Health, Adults & Community	0.102	-	-	-	-	13.934	-	<b>14.036</b>
Children's Services	43.788	-	0.715	0.590	-	28.437	1.671	<b>75.201</b>
Place	19.769	-	0.978	58.381	97.304	40.667	14.210	<b>231.309</b>
Resources	-	-	-	-	-	0.367	1.500	<b>1.867</b>
Corporate	-	-	-	105.540	-	6.415	20.501	<b>132.456</b>
<b>Total (Non HRA)</b>	<b>63.659</b>	<b>-</b>	<b>1.693</b>	<b>164.511</b>	<b>97.304</b>	<b>89.821</b>	<b>37.882</b>	<b>454.870</b>
Housing Revenue Account	-	90.287	-	62.338	104.709	-	43.812	<b>301.146</b>
<b>Total HRA</b>	<b>-</b>	<b>90.287</b>	<b>-</b>	<b>62.338</b>	<b>104.709</b>	<b>-</b>	<b>43.812</b>	<b>301.146</b>
<b>Total Funding</b>	<b>63.659</b>	<b>90.287</b>	<b>1.693</b>	<b>226.849</b>	<b>202.013</b>	<b>89.821</b>	<b>81.694</b>	<b>756.017</b>

**Proposed New Schemes 2018-19 to 2027-28 by Strategic Priority Outcome**

**Appendix 9D**

<b>Strategic Priority Outcome</b>	<b>2018-19 Budget £m</b>	<b>2019-20 Budget £m</b>	<b>2020-21 Budget £m</b>	<b>2021-22 Budget £m</b>	<b>2022-23 Budget £m</b>	<b>2023-24 Budget £m</b>	<b>2024-25 Budget £m</b>	<b>2025-26 Budget £m</b>	<b>2026-27 Budget £m</b>	<b>2027-28 Budget £m</b>	<b>2017-18 to 2027-28 Total Budget £m</b>
1.1 People access a range of education, training, and employment opportunities and feel they share the benefits from growth	0.200	-	-	-	-	-	-	-	-	-	<b>0.200</b>
1.2 Children and young people feel they are protected and get the best start in life and realise their potential	1.167	1.167	1.167	-	-	-	-	-	-	-	<b>3.500</b>
1.3 People access joined-up services when they need them and feel healthier and independent	4.429	1.326	2.791	0.308	0.326	-	-	-	-	-	<b>9.180</b>
1.4 Inequality is reduced and people live in a cohesive community	-	-	-	-	-	-	-	-	-	-	-
2.1 People live in a borough that is clean and green	6.418	9.967	6.410	4.230	4.230	4.500	4.500	4.500	4.500	4.500	<b>53.755</b>
2.2 People live in good quality and affordable homes and neighbourhoods	30.365	67.805	64.055	36.504	26.122	12.164	11.160	5.000	5.000	-	<b>258.175</b>
2.3 People live in safer neighbourhoods and anti-social behaviour is tackled	-	-	-	-	-	-	-	-	-	-	-
3.0 A focussed and efficient Council co-producing excellent services	4.250	3.650	42.450	2.000	1.500	1.500	1.500	1.500	1.500	1.500	<b>61.350</b>
<b>Total</b>	<b>46.829</b>	<b>83.915</b>	<b>116.873</b>	<b>43.042</b>	<b>32.178</b>	<b>18.164</b>	<b>17.160</b>	<b>11.000</b>	<b>11.000</b>	<b>6.000</b>	<b>386.160</b>

## **Appendix 10**

# **BUDGET CONSULTATION FEEDBACK**

## **Budget Consultation Feedback 2018-19**

- 1.1 The Council's 2018-19 budget consultation with residents, local businesses and other stakeholders ran from the 12<sup>th</sup> December 2017 to 22<sup>nd</sup> January 2018.
- 1.2 The budget pack published on the 22<sup>nd</sup> January 2018 included an analysis of the consultation responses received as at the 18<sup>th</sup> January 2018.
- 1.3 Now that consultation has concluded an updated position is provided below.
- 1.4 We received a total of 146 responses by close of consultation, the overall summary of responses is as follows:
  - More than half of the respondents agree with the approach of a three year budget as a way of protecting frontline services;
  - Almost half of respondents prefer that the council protects frontline services, rather than continue to invest resources in services that are council priorities, or reduce budgets across all services by the same proportion;
  - More than half of respondents support a 2% increase in council tax in 2018-19 to support adult social care services, and almost half of respondents support the proposal not to implement any additional inflationary increase in council tax above the adult social care precept of 2%.
- 1.5 Below is a detailed summary of responses received against each of the six questions that were asked.

## Summary of responses to the consultation (as at close of consultation)

The consultation comprised 6 questions, which are set out below along with an indication of the responses received to date.

### 1. Do you agree with the approach that the council is taking in 2018-19 and its plans for a three year budget as a way of protecting frontline services

#### Responses

Just over half of those who responded (55%) said they agree with the council's approach. 29% of respondents disagreed with our approach, and 16% left the question unanswered.

### 2. In your opinion, which council service(s) have the biggest impact on your life?

#### Responses

Council services which respondents said have the biggest impact on their lives are:

Environmental & Regulatory Services – 37%  
 Highways and Transport – 32%  
 Public Health – 30%  
 Education – 29%  
 Cultural Services – 27%  
 Housing – 26%  
 Children Social Care – 19%  
 Planning and Development – 19%  
 Adult Social Care – 17%  
 Central and other services – 17%

### 3. Would you prefer that the council:

- a) Reduces budgets across all services by the same proportion
- b) Continues to invest resources in services that are council priorities
- c) Protects frontline services

#### Responses

42% stated that they prefer the council to protect frontline services  
 33% would like the council to invest in services that are council priorities and  
 20% would like the council to reduce budgets across all services by the same proportion.  
 5% of people left this answer blank.

### 4. Do you think the impact of these savings on the borough will mean:

- a) Fewer services will be available
- b) More services will be available
- c) Council will be more efficient
- d) Council will be less efficient

- e) **Service quality will go down**
- f) **Service quality will improve**

### **Responses**

32% of those who responded believe that the impact of savings mean there will be fewer services available.

27% said the impact would mean more efficient services

22% said service quality would go down

5% thought the council would be less efficient

5% thought that more services would be available

5% thought service quality would go up and

4% of people left this question blank.

5. **The government has also said it expects councils to increase their council tax rate by an additional 1.75% every year to cover inflation. It has limited any inflationary increase to a maximum of 1.99%.**

**In setting its three year plan last year the council did not propose any inflationary increase to its council tax in 2018-19. We are planning to continue with this approach of not adding anything further for this to the council tax rate.**

**Do you support the proposal not to implement any additional inflationary increase in council tax above the adult social care precept of 2%?**

### **Responses**

48% of respondents support the proposal, and 36% stated that they do not support the proposal. The remaining did not answer/did not know.

6. **Last year the government said councils could add an additional charge for adult social care to support some of the most vulnerable residents in our borough. This could be an increase of up to 6% in council tax over the period 2017-2020.**

**In our medium term financial plan we proposed that this should be implemented in the following way: 3% in 2017-18 (which was approved by the council) 2% in 2018-19 and 1% in 2019-20**

**The proposal for 2018-19 would raise approximately £1.8m and cost the average household 37p per week.**

**Do you support the 2% increase in council tax to support adult social care services?**

### **Responses**

More than half of respondents (54%) support a 2% increase in council tax to support adult social care services, and 34% of respondents said no to a 2% increase in council tax. The remaining did not answer/did not know.



<b>FULL COUNCIL</b> <b>21<sup>st</sup> February 2018</b>	 <b>TOWER HAMLETS</b>
<b>Report of:</b> Zena Cooke, Corporate Director Resources	<b>Classification:</b> Unrestricted
<b>Treasury Management Strategy Statement For 2018-19</b>	

<b>Originating Officer(s)</b>	Bola Tobun - Investment & Treasury Manager
<b>Wards affected</b>	All wards

**Summary**

- 1) This report fulfils the Council's legal obligation under the Local Government Act 2003 to have regard to both the CIPFA Code and the CLG Guidance.
- 2) The Council is required by legislation and guidance to produce three strategy statements in relation to its treasury management arrangements. The three statements are:
  - a) a policy statement on the basis of which provision is to be made in the revenue accounts for the repayment of borrowing – Minimum Revenue Provision (MRP) Policy Statement;
  - b) a Treasury Management Strategy Statement which sets out the Council's proposed borrowing for the financial year and establishes the parameters (prudential and treasury indicators) within which officers under delegated authority may undertake such activities; and
  - c) an annual Investment Strategy which sets out the Council's policies for managing its investments and for giving priority to the security and liquidity of those investments.
- 3) This report also deals with the setting of Prudential Indicators for 2018-19, which ensure that the Council's capital investment decisions remain affordable, sustainable and prudent; the proposed indicators are detailed in Appendix 1. Under of the government's self-financing arrangements for the Housing Revenue Account (HRA) there are specific indicators relating to HRA capital investment.
- 4) The Department for Communities and Local Government (DCLG) issued revised Guidance on Local Authority Investments in March 2010 that requires the Authority to approve an investment strategy before the start of each financial year.
- 5) The Council adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2011 Edition (the CIPFA Code) which requires the Authority to approve a treasury management strategy before the start of each financial year. CIPFA consulted on changes to the Code in 2017, but has yet to publish a revised Code. The Code as it requires the following:

- a) Treasury Management Policy Statement which sets out the policies and objectives of the Council's treasury management activities (Appendix 3);
  - b) Treasury Management Practices which set out the manner in which the Council will seek to achieve those policies and objectives;
  - c) Approval by Full Council of Minimum Revenue Provision Policy, an annual Treasury Management Strategy Statement - including the Annual Investment Strategy and prudential indicators for the year ahead together with arrangements for a Mid-year Review Report and an Annual Report covering activities during the previous year;
  - d) Clear delegated responsibility for overseeing and monitoring treasury management policies and practices and for the execution and administration of treasury management decisions. For this Council the delegated body is the Audit Committee. The scheme of delegation for treasury management is shown in Appendix 4.
- 6) Officers will report details of the Council's treasury management activity to the Audit Committee at each of its meetings during the year. Additionally, a mid-year and full-year report will be presented to Full Council. More detailed reporting arrangements are shown in Appendix 5.
  - 7) The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny. Training will be arranged as required for members of the Audit Committee who are charged with reviewing and monitoring the Council's treasury management policies. The training of treasury management officers is also periodically reviewed and enhanced as appropriate.

### **Recommendations**

It is recommended that the Full Council to:

- i) Adopt the following policy and strategies:
  - a) The Minimum Revenue Provision Policy Statement set out in section 2 at annex A attached to this report;
  - b) The Treasury Management Strategy Statement set out in sections 5 & 6 at annex A attached to this report;
  - c) The Annual Investment Strategy set out in section 7 at annex A attached to this report, which officers involved in treasury management, must then follow;
- ii) Approve the prudential and treasury management indicators as set out in appendix 1 of annex A attached to this report.
- iii) Delegate authority to Corporate Director, Resources
  - to amend prudential and treasury indicators, once capital expenditure forecast is firmed up.
  - use alternative forms of investment, such as pooled funds should the appropriate opportunity arise to use them, and should it be prudent and of advantage to the Council to do so.

## 1 **REASONS FOR DECISIONS**

- 1.1 It is consistent with the requirements of treasury management specified by CIPFA, to which the Council is required to have regard under the Local Government Act 2003 and regulations made under that Act, for the Council to produce three strategy statements to support the Prudential Indicators which ensure that the Council's capital investment plans are affordable, sustainable and prudent. The three documents that the Council should produce are:
- Minimum Revenue Provision Policy Statement
  - Treasury Management Strategy, including prudential indicators
  - Investment Strategy

## 2 **ALTERNATIVE OPTIONS**

- 2.1 The Council is bound by legislation to have regard to the CIPFA requirements for treasury management. If the Council were to deviate from those requirements, there would need to be some good reason for doing so. It is not considered that there is any such reason, having regard to the need to ensure that the Council's capital investment plans are affordable, sustainable and prudent.
- 2.2 The strategies and policy statement put forward in the report are considered the best methods of achieving the CIPFA requirements. Whilst it may be possible to adopt variations of the strategies and policy statement, this would risk failing to achieve the goals of affordability, sustainability and prudence.

## 3. **BACKGROUND**

- 3.1 The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity primarily before considering investment return.
- 3.2 The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer term cash flow planning to ensure that the Council can meet its capital spending obligations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses.
- 3.3 CIPFA defines treasury management as:
- “The management of the local authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”*
- 3.4 **REPORTING REQUIREMENTS** -The Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals.
- I. **A treasury management strategy statement** (this report) – it covers:
- a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);

- the capital plans (including prudential indicators);
  - the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
  - an investment strategy (the parameters on how investments are to be managed).
- II. **A mid year treasury management report** – This will update members with the progress of the capital position, amending prudential indicators as necessary, and whether any policies require revision.
- III. **A treasury outturn report** – This provides details of annual actual prudential and treasury indicators and annual actual treasury operations compared to the annual estimates within the strategy.
- 3.5 The Council uses Capita Asset Services, Treasury solutions as its external treasury management advisors. The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and officers will ensure that undue reliance is not placed upon the external service providers.
- 3.6 The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members' responsible for scrutiny. Training will be arranged as required. The training needs of treasury management officers are periodically reviewed.

#### **The 2017/18 Strategy and Current Investment Position and Performance**

- 3.7 The Strategy for 2017/18 was approved by Full Council in February 2017 and set the following objectives:-
- a) The use of core cash for internal borrowing if not used for longer term investments.
  - b) The minimum Fitch credit ratings for the Council's investment policy:
    - Short Term: 'F1' the same criteria as last year
    - Long Term: 'A-' a notch down from 2016/17 criteria 'A'
  - c) The Council's budgeted investment return of £1.6m for 2017/18, with average rate of return 0.45% for average portfolio balances of £350m. Below table show the position of the investment income earned for this financial year to 31 December 2017.

Benchmark (Average 7 day LIBID)	Investment interest Earned	Average Cash Balance	Investment Interest Earned
0.23%	0.4%	£478m	£1.8m

- d) The above budget was based on investing upto £100m for over 1 year duration in order to obtain a higher return, unfortunately longer term rates did not improve for the Council's acceptable minimum investment criteria.
- e) Investments over 1 year is standing at £20m
- f) The Council has not borrowed short or long term to date.

## **TREASURY MANAGEMENT STRATEGY FOR 2018/19**

3.8 The strategy for 2018/19 covers two main areas:

### **Capital issues**

- the minimum revenue provision (MRP) policy;
- the capital plans and the prudential indicators.

### **Treasury management considerations:**

- economic and interest rates forecast;
- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy;
- service/policy investments.

3.9 The above elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, CLG MRP Guidance, the CIPFA Treasury Management Code and CLG Investment Guidance.

### **Developing the Strategy for 2018/19**

3.10 In formulating and executing the strategy for 2018/19, the Council will continue to have regard for the DCLG's guidance on Local Government Investments and the 2011 revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectional Guidance Notes.

3.11 The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.

3.12 The Council will also achieve optimum return on its investments commensurate with proper levels of security and liquidity. The borrowing of monies purely to on lend and make a return is unlawful and the Council will not engage in such activity.

3.13 The Council, in conjunction with its treasury management advisor, Arlingclose, will use Fitch, Moodys and Standard and Poor's ratings to derive its credit criteria. The Council's treasury adviser alerted officers to changes in ratings of all agencies.

3.14 If a downgrade means the counterparty or investment fund no longer meets the Council's minimum criteria, its use for further investment will be withdrawn immediately. If funds are already invested with the downgraded institution, a decision will be made by the Corporate Director, Resources whether to withdraw the funds and potentially incur a penalty.

- 3.15 If an institution or fund is placed under negative rating watch (i.e. there is a probability of a rating change in the short term and the likelihood of that change being negative) and it is currently at the minimum acceptable rating for placing investments, no further investments will be made with that institution.
- 3.16 The Corporate Director, Resources has delegated responsibility to add or withdraw institutions from the counterparty list when ratings change, either as advised by Arlingclose Limited (the Council's advisors) or from another reliable market source.
- 3.17 The minimum Fitch credit ratings for the Council's investment policy for this financial year has changed, consideration not given to short term rating element and long term credit rating minimum criteria is the same as 2017/18:
- Long Term: 'A-'
- 3.18 Other market intelligence will also be used to determine institutions' credit worthiness, such as financial press, financial broker advice and treasury management meetings with other authorities, e.g. London Treasury Officers Forum. If this information shows a negative outcome, no further investments will be made with that body.
- 3.19 The strategy will permit the use of unrated building societies or challenger banks with assets in excess of £1.5bn for investment purposes.
- 3.20 The strategy proposes the continued use of core cash from £100m up to £150m to be held for longer term investment of over one year, if the interest rates are higher and appropriately reflect higher risk.
- 3.21 The cash balances, not immediately required to finance expenditure, are lent to the money market for the most appropriate periods as indicated by the cash flow model and current market and economic conditions;
- a) Liquidity is maintained by the use of overnight deposits, MMF and call accounts;
  - b) The minimum amount of short-term cash balances required to support monthly cash flow management is £75 million;
  - c) The upper limit for investments longer than one year is £150 million;
  - d) The maximum period for longer term lending for banks, financial institutions and local authorities has been increased to 5 years;
  - e) All investment with institutions and investment schemes is undertaken in accordance with the Council's creditworthiness criteria as set out at section 7 of annex A attached to this report;
  - f) More cautious investment criteria are maintained during times of market uncertainty;
  - g) All investment with institutions and investment schemes is limited to the types of investment set out under the Council's approved "Specified" and "Non-Specified" Investments detailed at section 7 of annex A, and professional advice continues to be sought where appropriate;

- h) All investment is managed within the Council's approved investment/asset class limits.
- 3.22 In light of the bail-in and ring fencing issues (please see below section 3.49 - 3.55 under other treasury management issues), the Corporate Director, Resources and her officers have been looking at investment funds as these are a step up from simple money market funds, where the fund manager takes a modest increase in credit and/or duration risk in order to deliver a modest increase in return. The advantages of investments funds are listed below:
- Potentially enhanced investment returns
  - Diversifies opportunity and risk
  - More appropriate to prevailing economic conditions
  - Access to experienced fund managers and their resources
  - Resource-efficient management
- 3.24 It is also worth noting that these funds operate on a Variable Net Asset Value (VNAV) basis, so there is no guarantee that the sale price will be equal to or above the purchase price, not all the funds have credit ratings, although the majority do.
- 3.25 Most of the funds offer distributing (i.e. income paying) share classes but some only offer accumulating.
- 3.26 Officers have been having meetings with the Council's treasury adviser to get our investments requirements right, as the volatility, investment returns and minimum investment periods differ from fund to fund.

### **Capital Programme and Prudential Borrowing**

- 3.27 The table below summarises the capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Capital expenditure £m	2016/17 Actual	2017/18 Revised Estimate	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
General Fund	30.333	127.105	68.700	113.131	98.656
HRA	51.412	55.322	47.162	55.850	58.340
<b>Total</b>	<b>81.745</b>	<b>182.427</b>	<b>115.862</b>	<b>168.981</b>	<b>156.996</b>
<b>Financed by:</b>					
<i>Grant</i>	(31.591)	(23.576)	(8.270)	(11.920)	(9.259)
<i>Major Repairs Allowance</i>	(14.517)	(14.968)	(15.016)	(15.099)	(15.097)
<i>Schools Contribution</i>	0.000	(1.693)	0.000	0.000	0.000
<i>Capital Receipts</i>	(7.913)	(37.270)	(46.555)	(62.041)	(58.269)
<i>S106 (Developers Contributions)</i>	0.000	(29.735)	(13.067)	(22.192)	(14.861)
<i>Revenue Financing</i>	(25.627)	(34.432)	(12.929)	(15.329)	(11.966)
<b>Total Financing Requirement</b>	<b>(81.744)</b>	<b>(141.674)</b>	<b>(95.837)</b>	<b>(126.581)</b>	<b>(109.452)</b>
<b>Prudential Borrowing</b>	<b>2.097</b>	<b>40.753</b>	<b>20.025</b>	<b>42.400</b>	<b>47.545</b>

- 3.28 As part of the development of the prudential indicators attached as appendix 1 of annex A, which form part of the treasury management strategy, the Council must consider the affordability of its capital programme. In the past the programme has been financed by the use of capital resources such as receipts from asset sales and grants. The affordability of the programme is therefore calculated by the lost revenue income from the possible investment of the resources.
- 3.29 As shown in table above, there is a need to borrow up to £61m in total for 2018 to March 2019, £42m for 2019/20 and £47.5m for 2020/21 for the financing of capital expenditure as included in the current capital programme and the current prudential indicators. If the Council is to borrow, the affordability of the capital programme has been included in assessing the cost of borrowing along with the loss of investment income from the use of capital resources held in cash.
- 3.30 The current long term borrowing rate from the Public Works Loan Board is 2.93% for 25 years. Were the Council to temporarily borrow the necessary resources from its own cash balances rather than complete a further one year investment it would save the equivalent of 2.2% of the amount borrowed. The affordability of the capital programme has been calculated based upon the assumption that internal borrowing would occur initially.
- 3.31 The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash from the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as investment returns are low and counterparty risk is still an issue that needs to be considered.
- 3.32 Under the circumstances and given the risks within the economic forecast, a prudent approach will be adopted with the 2018/19 treasury operations. The Corporate Director, Resources and her officers will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances.
- 3.33 Should rates move quicker than the forecast predicts, the current and proposed strategies do allow the Corporate Director, Resources to take advantage of external borrowing. Any decisions will be reported to the appropriate decision making body at the next available opportunity.
- 3.34 The assumption is to borrow up to a maximum of £61m for 2018/19 and £42m for 2019/20, through the most economically advantageous method, as decided by the Corporate Director, Resources, from internal borrowing of core cash balances; PWLB loans; or other reputable sources of lending.
- 3.35 In summary the Council's borrowing strategy will give consideration to new borrowing in the following order of priority: -
- a) The most cost effective borrowing will be internal borrowing by running down cash balances and foregoing interest earned at historically low rates. However, in view of the overall forecast for long term borrowing rates to increase over the next few years, consideration will also be given to weighing the short term advantage of internal borrowing against potential long term costs if the opportunity is missed for taking loans at long term rates which will be higher in future years.



- b) Temporary borrowing from the money markets or other local authorities
  - c) PWLB variable rate loans for up to 10 years
  - d) Short dated borrowing from non PWLB below sources
  - e) Long term fixed rate market loans at rates significantly below PWLB rates for the equivalent maturity period (where available) and to maintaining an appropriate balance between PWLB and market debt in the debt portfolio.
  - f) PWLB borrowing for periods under 10 years where rates are expected to be significantly lower than rates for longer periods. This offers a range of options for new borrowing which will spread debt maturities away from a concentration in longer dated debt
- 3.36 The Council will continue to borrow in respect of the following:
- a) Maturing debt (net of minimum revenue provision).
  - b) Approved unsupported (prudential) capital expenditure.
  - c) To finance cash flow in the short term.

### **Investment Strategy**

- 3.37 The Council holds significant invested funds, representing income received in advance of expenditure plus balances and reserves held. In the past 12 months, the Authority's investment balance has ranged between £400m and £505m, and the levels are expected to reduce by £50m - £100m in the forthcoming year due to capital expenditure programme.
- 3.38 **Objectives:** Both the CIPFA Code and the CLG Guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. Where balances are expected to be invested for more than one year, the Council will aim to achieve a total return that is equal or higher than the prevailing rate of inflation, in order to maintain the spending power of the sum invested.
- 3.39 **Negative interest rates:** If the UK enters into a recession in 2018/19, there is a small chance that the Bank of England could set its Bank Rate at or below zero, which is likely to feed through to negative interest rates on all low risk, short-term investment options. This situation already exists in many other European countries. In this event, security will be measured as receiving the contractually agreed amount at maturity, even though this may be less than the amount originally invested.
- 3.40 **Strategy:** Given the increasing risk and very low returns from short-term unsecured bank investments, the Council aims to diversify into more secure and/or higher yielding asset classes during 2018/19. This is especially the case for the estimated £150m that is available for longer-term investment. All of the Council's surplus cash is currently invested in short-term unsecured bank deposits, certificates of deposit and money market funds. This

diversification will represent a substantial change in strategy over the coming year for the new strategy adopted in 2018/19.

### **Investment Return Budget to 2020/21**

- 3.41 A cash flow projection up to March 2021 has been created reflecting the spending proposals in the Budget Strategy 2018/19 onwards. The cash flow projection and the interest rates forecast shows that anticipated investment income of £1.6m for 2017/18, based on average cash balance of £350m and average investment return of 0.45%. The anticipated investment income for 2018/19 is budgeted as £4.4m with average rate of 1.1% on cash balance of £400m, whereby £100m of core cash balances to be invested in pooled funds for over 3-5 years earning investment rate of 2% per annum. For 2019/20, £4.5m is the budgeted income, with average rate of 1.3% on average cash balance of £350m and for 2019/20; £4.5m is the budgeted income, with average rate of 1.5% on average cash balance of £300m. The Council may need to accept a higher level of risk in order to achieve these targets, whilst maintaining due regard for security of capital and liquidity.

Year-End	Estimated Average Cash Balance £m	Investment Income Forecast £m	Average Interest Rate
31 <sup>st</sup> March 2019	400.00	4.40	1.10%
31 <sup>st</sup> March 2020	350.00	4.50	1.30%
31 <sup>st</sup> March 2021	300.00	4.50	1.5%

- 3.42 With reference to the proposal to use internal borrowing to finance the capital programme, as set out in the Capital Programme and Prudential Borrowing in annex A, the investment income suggested by the cash flow projection may be provided in part from internal charges or through the surplus generated by commercialisation projects.

### **Minimum Revenue Provision 2018/19**

- 3.43 Where spend is financed through the creation of debt, the Council is required to pay off an element of the accumulated capital spend each year. The total debt is identified as the capital financing reserve and ensures that the Council includes external and internal borrowing along with other forms of financing considered to be equivalent to borrowing.
- 3.44 The payment is made through a revenue charge (the minimum revenue provision - MRP) made against the Council's expenditure, although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision - VRP).
- 3.45 It is recommended that because of budget constraints in the medium term the continue adoption of the existing statutory calculation which is based on 4% of the aggregate assumed borrowing for general fund capital investment - termed the Capital Financing requirement (CFR) as the basis of the Councils MRP relating to supported borrowing
- 3.46 The Council will use the asset life method for the calculation of the Minimum Revenue Provision on all future unsupported borrowing.

3.47 Based on the Council’s latest estimate of its capital financing requirement, the budget for MRP for 2017/18 is £7.93m based on 2016/17 CFR of £281.703m and the budgeted MRP for 2018/19 is £7.92m based on estimated CFR for 2017/18 of £278.17m.

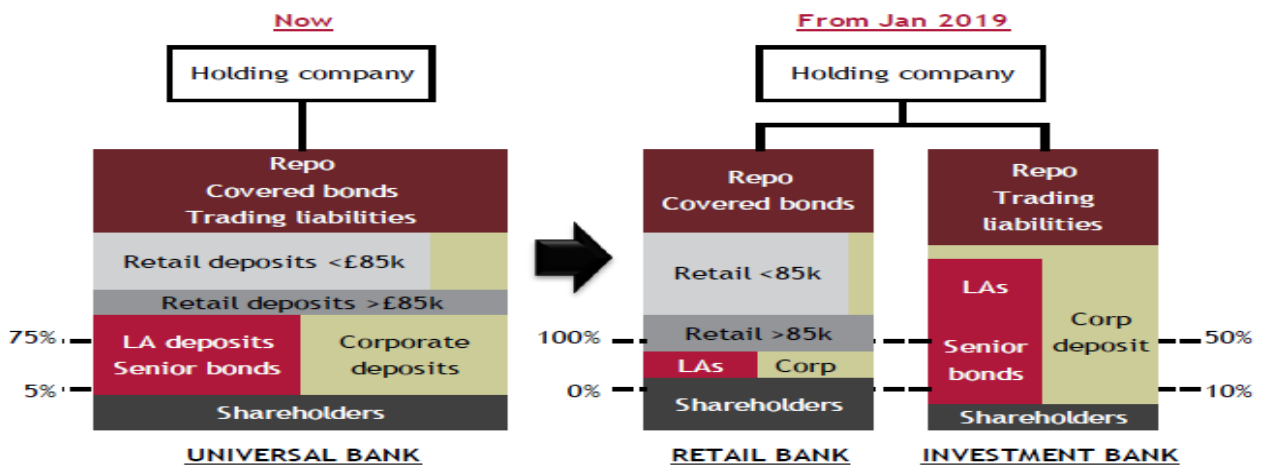
**Other Treasury Management Issues**

3.48 Further to implementation of MARKETS IN FINANCIAL INSTRUMENTS DIRECTIVE II (MiFID II), whereby the FCA has reclassified Local Authorities (LAs) as retail investors rather than the previous acquired professional status; this directive has been effective from 3 January 2018 and the Corporate Director, Resources has opted up as necessary with all our current counter parties, money market funds manager, advisers and brokers for the general treasury management functions.

**Bail-in Issue**

3.49 The failure of the banking system in a series of banking led crises that have stalked financial markets since the onset of the credit crunch in 2008. The new approach was the bail-in whereby a levy on the deposits would be made to lower the amount of the external bail-out. Initially, the levy would cover all bank deposits but it was revised, to apply to those with bank deposits in excess of £85k. This level reflects the extent of the current deposit guarantee limit in the Eurozone. The bail-in is the de facto solution to future bank problems across Europe including the UK. Hence term deposits with banks are riskier than before.

3.50 For professional investors, such as local authorities, the implications are that we will be the early contributors to a bail-in well before other retail depositors.



3.51 This follows that longer term deposits are even riskier because we are taking a credit view over the full term of the illiquid investment. So for bank deposits the risk is higher and yet returns are lower. This makes bank deposits an unsustainable mainstay of local authority investment activity.

**UK Bank Ring-fencing**

3.52 From January 2019 at the latest, the largest UK banks will be required to separate their retail banking services to individuals and small businesses from their investment banking activities. In practice this will only affect the big four banks (Barclays, Lloyds, HSBC and RBS), since other UK banks and building

societies either only conduct retail banking activities or have less than £25 billion of Financial Services Compensation Scheme - covered deposits.

- 3.53 Barclays Bank, HSBC Bank and Royal Bank of Scotland intend to keep the existing legal entity as the non-ring-fenced “investment” bank, although RBS will be renamed NatWest Markets. Their ring-fenced “retail” banks will be called Barclays Bank UK, HSBC UK Bank and Royal Bank of Scotland respectively. The existing Lloyds Bank legal entity will become the retail bank, and a new investment will be created and named Lloyds Bank Capital Markets. NatWest Bank and Bank of Scotland will be ring-fenced “retail” banks.
- 3.54 If a UK bank experiences financial difficulties, “bail-in” arrangements will operate which will either reduce the value of deposits made or convert investments into shares. Based on the current understanding from the Council’s treasury management advisors, the probability of a bail-in is smaller at a retail bank, but the loss incurred would likely be a larger percentage of the investment deposited. This is because retail banks will typically have more capital to protect against losses, but fewer wholesale deposits and senior unsecured bonds to share losses with.
- 3.55 All UK banks with more than £25bn retail deposits are required to split into two banks by end 2018:
- A ring-fenced "retail" bank, providing basic services to individuals and SMEs
  - A non-ring-fenced "investment" bank conducting higher risk activities

The law permits both banks to accept deposits from local authorities, Arlingclose expect bail-ins to be rarer, but larger, at retail banks than investment banks.

### **Prudential Code**

- 3.56 The major change proposed is the introduction of a new report to full Council called the capital strategy, covering capital expenditure, investments, debt and other liabilities. It should be written at a relatively high level, suitable for all elected members to understand, and will include three prudential indicators – the authorised limit, the operational boundary and the capital expenditure total. Approval of the more technical detail, the remaining prudential indicators and the treasury management strategy can then be delegated to a committee where members with relevant skills or interests can take more time to properly approve the strategy and monitor the outcomes.
- 3.57 However, since government guidance still requires full Council to approve an investment strategy, MRP statement and (in Scotland) an annual report, CIPFA’s plans to reduce reporting to full Council.

### **Treasury Management Code**

- 3.58 The main proposed change to the Code is to extend the definition of “investments” to include non-treasury investments held primarily for financial returns, such as investment property.

- 3.59 A new TMP 13 is introduced to note that risk management, governance and reporting procedures may be different for non-treasury investments. However, the objectives of security, liquidity and yield will apply to all investments.
- 3.60 Other proposed changes to the Treasury Management Code include:
- a) Approval of the treasury management strategy may be delegated to a committee providing that full Council approves the capital strategy (see above under Prudential Code), although the clauses to be formally adopted in standing orders currently still require full Council to approve the strategy.
  - b) The inclusion of financial guarantees as instruments requiring risk management
  - c) Changing the investments over 364 days indicator to 365 days
  - d) Replacing the indicator on fixed and variable interest rates with a requirement to state how interest rate risk is managed
  - e) Extending the maturity profile indicator to include variable rate

#### **IFRS 9 – From 2018/19 Classification of Financial Assets**

- 3.61 Changes in fair value will impact revenue for:
- Structured loans and deposits where the cash flows are not solely payments of principal and interest (e.g. prepayment at par, credit-linked, equity-linked)
  - Pooled funds and shares, unless an irrevocable option is taken to present fair value changes in unusable reserves (This option comes with significant new disclosures and so is only suitable for those investments that will be held for the long-term)

#### **Impairment of Financial Assets**

- 3.62 Expected 12 -month credit losses must be set aside and charged to revenue for most assets
- a) Deposits, loans, bonds, lease and trade receivables
  - b) As little as 0.02% for an A-rated deposit
  - c) Maybe 3.8% for an average risk company loan
- 3.63 If credit risk increases significantly, then lifetime losses must be set aside, maybe 15% on a higher risk 5 year loan.
- 3.64 Amounts set aside are credited back to revenue if there is no default.
- 3.65 Impairments not applicable if non-contractual for example, Low Volatility Net Asset Value (LVNAV) Money Market Funds (MMFs), pooled funds and shares

#### **4. COMMENTS OF THE CHIEF FINANCIAL OFFICER**

- 4.1 The comments of the Corporate Director Resources are incorporated in the report

#### **5. LEGAL COMMENTS**

- 5.1 The Local Government Act 2003 ('the 2003 Act') provides a framework for the capital finance of local authorities. It provides a power to borrow and imposes a duty on local authorities to determine an affordable borrowing limit. It provides a

power to invest. Fundamental to the operation of the scheme is an understanding that authorities will have regard to proper accounting practices recommended by the Chartered Institute of Public Finance and Accountancy (CIPFA) in carrying out capital finance functions.

- 5.2 The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 ('the 2003 Regulations') require the Council to have regard to the CIPFA publication "Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes" ("the Treasury Management Code") in carrying out capital finance functions under the 2003 Act. If after having regard to the Treasury Management Code the Council wished not to follow it, there would need to be some good reason for such deviation.
- 5.3 It is a key principle of the Treasury Management Code that an authority should put in place "comprehensive objectives, policies and practices, strategies and reporting arrangements for the effective management and control of their treasury management activities". Treasury management activities cover the management of the Council's investments and cash flows, its banking, money market and capital market transactions, the effective control of risks associated with those activities and the pursuit of optimum performance consistent with those risks. It is consistent with the key principles expressed in the Treasury Management Code for the Council to adopt the strategies and policies proposed in the report.
- 5.4 The report proposes that the treasury management strategy will incorporate prudential indicators. The 2003 Regulations also requires the Council to have regard to the CIPFA publication "Prudential Code for Capital Finance in Local Authorities" ("the Prudential Code") when carrying out its duty under the Act to determine an affordable borrowing limit. The Prudential Code specifies a minimum level of prudential indicators required to ensure affordability, sustainability and prudence. The report properly brings forward these matters for determination by the Council. If after having regard to the Prudential Code the Council wished not to follow it, there would need to be some good reason for such deviation.
- 5.5 The Local Government Act 2000 and regulations made under the Act provide that adoption of a plan or strategy for control of a local authority's borrowing, investments or capital expenditure, or for determining the authority's minimum revenue provision, is a matter that should not be the sole responsibility of the authority's executive and, accordingly, it is appropriate for the Cabinet to agree these matters and for them to then be considered by Council.
- 5.6 The report sets out the recommendations of the Corporate Director Resources in relation to the Council's minimum revenue provision, treasury management strategy and its annual investment strategy. The Corporate Director Resources has responsibility for overseeing the proper administration of the Council's financial affairs, as required by section 151 of the Local Government Act 1972 and is the appropriate officer to advise in relation to these matters.
- 5.7 When considering its approach to the treasury management matters set out in the report, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't (the public sector equality duty).

## 6 **ONE TOWER HAMLETS CONSIDERATIONS**

- 6.1 Capital investment will contribute to achievement of the corporate objectives, including all those relating to equalities and achieving One Tower Hamlets. Establishing the statutory policy statements required facilitates the capital investments and ensures that it is prudent.

## 7. **BEST VALUE (BV) IMPLICATIONS**

- 7.1 The Treasury Management Strategy and Investment Strategy and the arrangements put in place to monitor them should ensure that the Council optimises the use of its monetary resources within the constraints placed on the Council by statute, appropriate management of risk and operational requirements.

- 7.2 Assessment of value for money is achieved through:
- Monitoring against benchmarks
  - Operating within budget

## 8 **SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT**

- 8.1 There are no sustainable actions for a greener environment implication.

## 9 **RISK MANAGEMENT IMPLICATIONS**

- 9.1 There is inevitably a degree of risk inherent in all treasury activity.
- 9.2 The Investment Strategy identifies the risk associated with different classes of investment instruments and sets the parameters within which treasury activities can be undertaken and controls and processes appropriate for that risk.
- 9.3 Treasury operations are undertaken by nominated officers within the parameters prescribed by the Treasury Management Policy Statement as approved by the Council.
- 9.4 The Council is ultimately responsible for risk management in relation to its treasury activities. However, in determining the risk and appropriate controls to put in place the Council has obtained independent advice from Capita Treasury Services who specialise in Council treasury issues.

## 10 **CRIME AND DISORDER REDUCTION IMPLICATIONS**

- 10.1 There are no any crime and disorder reduction implications arising from this report.

### **ANNEX & APPENDICES**

#### **ANNEX**

[Annex A – Treasury Management Strategy Statement \(Working Document\) for 2018-19](#)

#### **APPENDICES**

- Appendix A – Counter Party Credit Rating List
- Appendix 1 – Prudential and Treasury Indicators
- Appendix 2 – Definition of Fitch Credit Ratings
- Appendix 3 – Treasury Management Policy Statement
- Appendix 4 – Treasury Management Scheme of Delegation

Appendix 5 – Treasury Management Reporting Arrangement

Appendix 6 – Glossary

**Local Government Act, 1972 Section 100D (As amended)**

**List of “Background Papers” used in the preparation of this report**

<b>Brief description of “background papers”</b>	<b>Name and telephone number of holder and address where open to inspection</b>
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	<i>Bola Tobun, x4733, Mulberry Place</i>
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# Annex A

## **Working Document**

### **Treasury Management Strategy Statement**

### **Minimum Revenue Provision Policy Statement and**

### **Annual Investment Strategy**

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**London Borough of Tower Hamlets**  
**2018/19**

## 1. **BACKGROUND**

1.1 The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity primarily before considering investment return.

1.2 The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer term cash flow planning to ensure that the Council can meet its capital spending obligations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses.

1.3 CIPFA defines treasury management as:

*"The management of the local authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."*

1.4 **REPORTING REQUIREMENTS** -The Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals.

I. **An annual treasury management strategy statement** (this report) – it covers:

- a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
- the capital plans (including prudential indicators);
- the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
- an investment strategy (the parameters on how investments are to be managed).

II. **A mid year treasury management report** – This will update members with the progress of the capital position, amending prudential indicators as necessary, and whether any policies require revision.

III. **A treasury outturn report** – This provides details of annual actual prudential and treasury indicators and annual actual treasury operations compared to the annual estimates within the strategy.

1.5 **SCRUTINY** - The above reports are required to be adequately scrutinised before being recommended to the Council. This role is being undertaken by the Auditee Committee and or Cabinet.

1.6 **Treasury management consultants** - The Council uses Arlingclose Ltd, as its external treasury management advisors. The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and officers will ensure that undue reliance is not placed upon the external service providers.

1.7 **Training** - The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny. Training will be arranged as required. The training needs of treasury management officers are periodically reviewed.

1.8 **TREASURY MANAGEMENT STRATEGY FOR 2018/19**

The strategy for 2018/19 covers two main areas:

**Capital issues and considerations:**

- the minimum revenue provision (MRP) policy;
- the capital plans and the prudential indicators.

**Treasury management issues and considerations:**

- economic & interest rate forecast;
- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy;
- service/policy investments.

1.9 These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, CLG MRP Guidance, the CIPFA Treasury Management Code and CLG Investment Guidance.

## 2. MINIMUM REVENUE PROVISION (MRP) POLICY STATEMENT

- 2.1 The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP).
- 2.2 The Department of Communities and Local Government (DCLG) require Councils to establish a policy statement on the MRP and has published guidance on the four potential methodologies to be adopted.
- 2.3 The guidance distinguishes between supported borrowing which relates to assumed borrowing which is incorporated into the Government's Formula Grant calculation and consequently has an associated amount of government grant and unsupported borrowing. Unsupported borrowing is essentially prudential borrowing the financing costs of which have to be met by the Council locally.
- 2.4 There is no requirement on the HRA to make a minimum revenue provision but there is a requirement for a charge for depreciation to be made pending finalisation of transitional arrangements following introduction of Self-Financing.
- 2.5 The DCLG guidance provides two options for the calculation of the MRP associated with each classes of borrowing.
- 2.6 The two options for the supported borrowing are variants of the existing statutory calculation which is based on 4% of the aggregate assumed borrowing for general fund capital investment - termed the Capital Financing requirement (CFR). The two options are:
- **Option 1** (Regulatory Method): To continue the current statutory calculation based on the gross CFR less a dampening factor to mitigate the impact on revenue budgets of the transition from the previous system. This calculation is further adjusted to repay debt transferred to the Council when the Inner London Education Authority (ILEA) was abolished.
  - **Option 2** (Capital Financing Requirement Method): The statutory calculation without the dampener which will increase the annual charge to revenue budget.
- 2.7 The options purely relate to the timing of debt repayment rather than the gross amounts payable over the term of the loans. The higher MRP payable under option 2 will accelerate the repayment of debt.
- 2.8 It is recommended that because of budget constraints in the medium term the existing statutory calculation with the ILEA adjustment be adopted as the basis of the Councils MRP relating to supported borrowing.
- 2.9 The guidance provides two options for the MRP relating to unsupported borrowing. The options are:-
- **Option 3** (Asset Life Method): To repay the borrowing over the estimated life of the asset with the provision calculated on either an equal instalment or annuity basis. This method has the advantage of simplicity and relating repayments to the period over which the asset is providing benefit.

- **Option 4 (Depreciation Method):** A calculation based on depreciation. This is extremely complex and there are potential difficulties in changing estimated life and residual values.

- 2.10 It is recommended that option 3 is adopted for unsupported borrowing.
- 2.11 The Council is required under regulation 28 of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 to determine for each financial year an amount of minimum revenue provision which it considers to be prudent.
- 2.12 **It is proposed that the Council makes Minimum Revenue Provision using Option 1 (Regulatory Method) for supported borrowing and Option 3 (Asset Life Method) for unsupported borrowing.**
- 2.13 Capital expenditure incurred during 2018/19 will not be subject to a MRP charge until 2019/20. Based on the Council's latest estimate of its Capital Financing Requirement, the budget for MRP has been set as follows:

	<b>31.03.2018 Estimated CFR £</b>	<b>2018/19 Estimated MRP £</b>
<i>Capital expenditure before 01.04.2008</i>	124,987,090	5,207,795
<i>Supported and unsupported capital expenditure after 31.03.2008</i>	17,119,745	684,969
<i>Finance leases and Private Finance Initiative</i>	52,089,567	1,784,851
<i>Loans to other bodies repaid in instalments</i>	Nil	Nil
<b>Total General Fund</b>	<b>194,196,402</b>	<b>7,469,303</b>
<i>Assets in the Housing Revenue Account</i>	68,782,301	Nil
<i>Supported and unsupported capital expenditure after 31.03.2008</i>	789,664	14,899
<i>Finance leases and Private Finance Initiative</i>	14,248,672	433,717
<b>Total Housing Revenue Account</b>	<b>83,820,637</b>	<b>448,616</b>
<b>Total</b>	<b>278,170,039</b>	<b>7,917,920</b>

#### **THE CAPITAL PRUDENTIAL INDICATORS 2018/19 – 2020/21**

- 3.1 Council's capital expenditure plans are the key driver of treasury management activity. The Local Government Act 2003 requires the Council to have regard to the Chartered Institute of Public Finance and Accountancy's Prudential Code for Capital Finance in Local Authorities (the Prudential Code) when determining how much money it can afford to borrow.
- 3.2 The objectives of the Prudential Code are to ensure, within a clear framework, that the capital investment plans of local authorities are affordable, prudent and sustainable, and that treasury management decisions are taken in accordance with good professional practice. To demonstrate that the Authority has fulfilled these objectives, the Prudential Code sets out the following indicators that must be set and monitored each year.

- 3.3 **Estimates of Capital expenditure** - The table below summarises the Council's planned capital expenditure and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Capital expenditure £m	2016/17 Actual	2017/18 Revised	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
General Fund	30.333	127.105	68.700	113.131	98.656
HRA	51.412	55.322	47.162	55.850	58.340
<b>Total</b>	<b>81.745</b>	<b>182.427</b>	<b>115.862</b>	<b>168.981</b>	<b>156.996</b>
<b>Financed by:</b>					
<i>Grant</i>	(31.591)	(23.576)	(8.270)	(11.920)	(9.259)
<i>Major Repairs Allowance</i>	(14.517)	(14.968)	(15.016)	(15.099)	(15.097)
<i>Schools Contribution</i>	0.000	(1.693)	0.000	0.000	0.000
<i>Capital Receipts</i>	(7.913)	(37.270)	(46.555)	(62.041)	(58.269)
<i>S106 (Developers Contributions)</i>	0.000	(29.735)	(13.067)	(22.192)	(14.861)
<i>Revenue Financing</i>	(25.627)	(34.432)	(12.929)	(15.329)	(11.966)
<b>Total Financing Requirement</b>	<b>(79.648)</b>	<b>(141.674)</b>	<b>(95.837)</b>	<b>(126.581)</b>	<b>(109.452)</b>
<b>Prudential Borrowing</b>	<b>2.097</b>	<b>40.753</b>	<b>20.025</b>	<b>42.400</b>	<b>47.545</b>

- 3.4 **Other long term liabilities** - The above financing need excludes other long term liabilities, such as PFI and leasing arrangements which already include borrowing instruments.

- 3.5 **The Council's borrowing need (the Capital Financing Requirement)** - The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's underlying borrowing need. Any capital expenditure above, which has not immediately been paid for, will increase the CFR. The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the borrowing need in line with each asset's life.

**The Council is asked to approve the CFR projections below:**

£m	2016/17 Actual	2017/18 Revised	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
<b>Capital Financing Requirement</b>					
CFR – HRA	78.360	232.547	234.855	253.339	259.105
CFR – General Fund	203.342	78.360	82.957	93.548	120.849
<b>Total CFR</b>	<b>281.702</b>	<b>310.907</b>	<b>317.812</b>	<b>346.887</b>	<b>379.954</b>
<b>Movement in CFR</b>	<b>19.115</b>	<b>29.205</b>	<b>6.905</b>	<b>29.076</b>	<b>33.066</b>
<b>Movement in CFR represented by</b>					
Net in year financing need	2.096	40.753	20.025	42.400	47.545
MRP/VRP & other Financing movements	17.018	(11.548)	(13.120)	(13.324)	(14.478)
<b>Movement in CFR</b>	<b>19.115</b>	<b>29.205</b>	<b>6.905</b>	<b>29.076</b>	<b>33.066</b>

- 3.6 The CFR is forecast to **rise by £68m** over the next three years as capital expenditure financed by debt outweighs resources put aside for debt repayment.
- 3.7 The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances.
- 3.8 The Council has set the following **affordability prudential indicators** as prescribed by the code and these are set out below and detailed in Appendix 1.
- 3.9 **Ratio of financing costs to net revenue stream** - This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet financing costs, net of investment income.

	2016/17 Actual	2017/18 Revised	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
General Fund (GF)	1.06%	0.74%	0.71%	0.71%	0.68%
HRA	4.18%	4.94%	6.01%	7.26%	8.42%

- 3.10 **Incremental impact of capital investment decisions** - This indicator identifies affordability by showing the impact of capital investment decisions on Council Tax and housing rent levels. The incremental impact is the difference between the total revenue budget requirement of the current approved capital programme and the revenue budget requirement arising from the capital programme summarised earlier in this report. The assumptions are based on the budget, but will invariably include some estimates, such as the level of Government support, which are not published over a three year period.

£	2016/17 Actual	2017/18 Revised	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
<b>GF – Council tax increase in annual band D</b>	19.079	30.220	34.984	38.361	40.292
<b>HRA increase in weekly housing rent levels</b>	5.837	1.343	1.588	1.921	0.000





#### 4. ECONOMIC & INTEREST RATE FORECAST

4.1 The borrowing and investment strategy is in part determined by the economic environment within which it operates. The treasury advisor to the Council is Arlingclose Ltd and part of their service is to assist the Council to formulate a view on interest rates. The following table gives Arlingclose's overall view on interest rates for the next three years.

	Dec-17	Mar-18	Jun-18	Sep-18	Dec-18	Mar-19	Jun-19	Sep-19	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Average
<b>Official Bank Rate</b>														
Upside risk	0.00	0.00	0.00	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.19
<b>Arlingclose Central Case</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>
Downside risk	0.00	0.00	0.00	0.00	0.00	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.15
<b>3-month LIBID rate</b>														
Upside risk	0.10	0.10	0.10	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.22
<b>Arlingclose Central Case</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>	<b>0.50</b>
Downside risk	-0.10	-0.10	-0.15	-0.15	-0.15	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.25	-0.20
<b>1-yr LIBID rate</b>														
Upside risk	0.15	0.15	0.20	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.27
<b>Arlingclose Central Case</b>	<b>0.70</b>	<b>0.70</b>	<b>0.70</b>	<b>0.70</b>	<b>0.80</b>	<b>0.80</b>	<b>0.80</b>	<b>0.80</b>	<b>0.80</b>	<b>0.80</b>	<b>0.80</b>	<b>0.80</b>	<b>0.80</b>	<b>0.77</b>
Downside risk	-0.15	-0.20	-0.30	-0.30	-0.30	-0.30	-0.30	-0.30	-0.30	-0.30	-0.30	-0.15	-0.15	-0.26
<b>5-yr gilt yield</b>														
Upside risk	0.20	0.25	0.25	0.25	0.30	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.40	0.32
<b>Arlingclose Central Case</b>	<b>0.75</b>	<b>0.75</b>	<b>0.80</b>	<b>0.80</b>	<b>0.80</b>	<b>0.85</b>	<b>0.90</b>	<b>0.90</b>	<b>0.95</b>	<b>0.95</b>	<b>1.00</b>	<b>1.05</b>	<b>1.10</b>	<b>0.89</b>
Downside risk	-0.20	-0.20	-0.25	-0.25	-0.25	-0.35	-0.40	-0.40	-0.40	-0.40	-0.40	-0.40	-0.40	-0.33
<b>10-yr gilt yield</b>														
Upside risk	0.20	0.25	0.25	0.25	0.30	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.40	0.32
<b>Arlingclose Central Case</b>	<b>1.25</b>	<b>1.25</b>	<b>1.25</b>	<b>1.25</b>	<b>1.25</b>	<b>1.30</b>	<b>1.30</b>	<b>1.35</b>	<b>1.40</b>	<b>1.45</b>	<b>1.50</b>	<b>1.55</b>	<b>1.55</b>	<b>1.36</b>
Downside risk	-0.20	-0.25	-0.25	-0.25	-0.25	-0.30	-0.35	-0.40	-0.40	-0.40	-0.40	-0.40	-0.40	-0.33
<b>20-yr gilt yield</b>														
Upside risk	0.20	0.25	0.25	0.25	0.30	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.40	0.32
<b>Arlingclose Central Case</b>	<b>1.85</b>	<b>1.85</b>	<b>1.85</b>	<b>1.85</b>	<b>1.85</b>	<b>1.90</b>	<b>1.90</b>	<b>1.95</b>	<b>1.95</b>	<b>2.00</b>	<b>2.05</b>	<b>2.05</b>	<b>2.05</b>	<b>1.93</b>
Downside risk	-0.20	-0.30	-0.25	-0.25	-0.30	-0.35	-0.40	-0.45	-0.50	-0.50	-0.50	-0.50	-0.50	-0.38
<b>50-yr gilt yield</b>														
Upside risk	0.20	0.25	0.25	0.25	0.30	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.40	0.32
<b>Arlingclose Central Case</b>	<b>1.70</b>	<b>1.70</b>	<b>1.70</b>	<b>1.70</b>	<b>1.70</b>	<b>1.75</b>	<b>1.80</b>	<b>1.85</b>	<b>1.90</b>	<b>1.95</b>	<b>1.95</b>	<b>1.95</b>	<b>1.95</b>	<b>1.82</b>
Downside risk	-0.30	-0.30	-0.25	-0.25	-0.30	-0.35	-0.40	-0.45	-0.50	-0.50	-0.50	-0.50	-0.50	-0.39

#### Underlying assumptions:

- 4.2 In a 7-2 vote, the MPC increased Bank Rate in line with market expectations to 0.5%. The minutes re-emphasised that any prospective increases in Bank Rate would be expected to be at a gradual pace and to a limited extent.
- 4.3 Further potential movement in Bank Rate is reliant on economic data and the likely outcome of the EU negotiations. Policymakers have downwardly assessed the supply capacity of the UK economy, suggesting inflationary growth is more likely. However, the MPC will be wary of raising rates much further amid low business and household confidence.

- 4.4 The UK economy faces a challenging outlook as the minority government continues to negotiate the country's exit from the European Union. While recent economic data has improved, it has done so from a low base: UK Q3 2017 GDP growth was 0.4%, after a 0.3% expansion in Q2.
- 4.5 Household consumption growth, the driver of recent UK GDP growth, has softened following a contraction in real wages, despite both saving rates and consumer credit volumes indicating that some households continue to spend in the absence of wage growth. Policymakers have expressed concern about the continued expansion of consumer credit; any action taken will further dampen household spending.
- 4.6 Some data has held up better than expected, with unemployment continuing to decline and house prices remaining relatively resilient. However, both of these factors can also be seen in a negative light, displaying the structural lack of investment in the UK economy post financial crisis. Weaker long term growth may prompt deterioration in the UK's fiscal position.
- 4.7 The depreciation in sterling may assist the economy to rebalance away from spending. Export volumes will increase, helped by a stronger Eurozone economic expansion.
- 4.8 Near-term global growth prospects have continued to improve and broaden, and expectations of inflation are subdued. Central banks are moving to reduce the level of monetary stimulus.
- 4.9 Geo-political risks remains elevated and helps to anchor safe-haven flows into the UK government bond (gilt) market.

**Forecast:**

- 4.10 The MPC has increased Bank Rate, largely to meet expectations they themselves created. Future expectations for higher short term interest rates are subdued. On-going decisions remain data dependant and negotiations on exiting the EU cast a shadow over monetary policy decisions.
- 4.11 The Arlingclose central case for Bank Rate is 0.5% over the medium term. The risks to the forecast are broadly balanced on both sides.
- 4.12 The Arlingclose central case is for gilt yields to remain broadly stable across the medium term. Upward movement will be limited, although the UK government's seemingly deteriorating fiscal stance is an upside risk.

**5. TREASURY MANAGEMENT CONSIDERATIONS AND DEVELOPMENT**

- 5.1 The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The Council anticipates its cash balances in 2018/19 to average around £350m, if we persist with the policy of internal borrowing to fund the Council's underlying need to borrow.
- 5.2 The Pension Fund surplus cash will continue to be invested in accordance with the Council's Treasury Management Strategy agreed by Full Council, under the delegated authority of the Corporate Director, Resources to manage within agreed parameters.

- 5.3 The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.
- 5.4 **Core funds and expected investment balances** – The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales, etc.).

Detailed below are estimates of the year end balances of investments.

Year End Resources	2016/17 Actual	2017/18 Projected Outturn	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
Expected Investments	£381.4m	£450m	£400m	£350m	£300m

- 5.5 **Current portfolio position** - The Council's treasury portfolio position at 31 March 2017, with forward projections are summarised below. The table shows the actual external debt (the treasury management operations), against the underlying capital borrowing need (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

£m	31 <sup>st</sup> March 2017 Actual	31 <sup>st</sup> March 2018 Projected Outturn	31 <sup>st</sup> March 2019 Estimate	31 <sup>st</sup> March 2020 Estimate	31 <sup>st</sup> March 2021 Estimate
HRA CFR	84.269	232.547	234.855	253.339	259.105
General Fund CFR	197.434	78.360	82.957	93.548	120.849
<b>Total CFR</b>	<b>281.703</b>	<b>310.907</b>	<b>317.812</b>	<b>346.887</b>	<b>379.954</b>
Less: Other debt liabilities *	(36.304)	(34.957)	(33.415)	(31.484)	(29.348)
<b>Borrowing CFR</b>	<b>245.399</b>	<b>275.950</b>	<b>284.397</b>	<b>315.403</b>	<b>350.606</b>
Less: External Borrowing	(85.936)	(84.296)	(83.293)	(82.289)	(81.534)
<b>Internal Borrowing</b>	<b>159.463</b>	<b>168.165</b>	<b>150.615</b>	<b>152.625</b>	<b>213.583</b>
Less: Usable reserves	(478.489)	(473.489)	(450.489)	(430.489)	(405.489)
Less: Working capital	(42.338)	(281.8349)	(249.3853)	(197.3746)	(136.4173)
<b>Investments/(New Borrowing)</b>	<b>361.364</b>	<b>450.000</b>	<b>400.000</b>	<b>350.000</b>	<b>300.00</b>

- 5.6 Within the prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2018/19 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue purposes.

- 5.7 The Corporate Director of Resources reports that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.
- 5.8 **Investment treasury indicator and limit** - total principal funds invested for greater than 1 year. These limits are set with regard to the Council's liquidity requirements and to reduce the need for early sale of an investment, and are based on the availability of funds after each year-end.
- 5.9 **Investments Longer than a Year:** The Code of Practice requires the Council to give consideration to longer-term investment and set an upper limit for principal sums to be invested for longer than one year. The Council currently has £100m limit for investments invested for longer than one year.
- 5.10 Therefore taking all of the abovementioned into consideration, in order for the Council to have flexibility in investing in high quality and better returns pooled funds, to meet the Council's risk/reward requirements. The Council's treasury adviser focuses on pooled funds that offer consistency of income return and also preferred clients to invest across a range rather than concentrating on one or two as each fund has different risks, given the diversification, however the primary risk is market risk as some funds have volatile capital values. It is therefore recommended that the Council increase and set an upper limit for principal sums to be invested for longer than one year at £150m.

**The Council is asked to approve the treasury indicator and limit: -**

Maximum principal sums invested > 1 year				
£m	2017/18	2018/19	2019/20	2020/21
Principal sums invested > 1 year	£100m	£150m	£150m	£150m

- 5.11 **Treasury Indicators: limits to borrowing activity for 2018-19 to 2020-21** Treasury indicators are about setting parameters within which within which officers can take treasury management decisions. The Council measures and manages its exposures to treasury management risks using the following indicators and also detailed in Appendix 1 of this report.
- 5.12 **Security:** The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating *or* credit score of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

	Target
Portfolio average credit rating <i>or</i> score	A <i>or</i> 6.0

- 5.13 **Liquidity:** The Authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling [three] month period, without additional borrowing.

	Target
Total cash available within [3] months	£100m

### Investment returns expectations

- 5.14 Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months).
- 5.15 Policy Rate is forecast to remain flat at 0.50%. Bank Rate forecasts for financial year ends (March) are:
- 2018/19 0.50%
  - 2019/20 0.50%
  - 2020/21 0.50%
- 5.16 There are downside risks to these forecasts (i.e. further reduction in Bank Rate) if economic growth weakens. However, should the pace of growth quicken and / or forecasts for increases in inflation rise, there could be an upside risk i.e. Bank Rate increases occur earlier and / or at a quicker pace.
- 5.17 Stated below are the estimated average rates of investment earnings for investments placed for this year and available for each financial year for the next three years:
- 2017/18 0.55%
  - 2018/19 1.10%
  - 2019/20 1.30%
  - 2020/21 1.50%
- 5.18 For its cash flow generated balances, the Council will seek to utilise money market funds and short-dated deposits (overnight to 100 days), such as its Santander 95 days call account in order to benefit from the compounding of interest.
- 5.19 **Provision for Credit-related Losses** - If any of the Council's investments appear at risk of loss due to default, provision would need to be made from revenue for the appropriate amount.

## 6. **BORROWING STRATEGY**

- 6.1 The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as investment returns are low and counterparty risk is relatively high.
- 6.2 Against this background and the risks within the economic forecast, caution will be adopted with the 2018/19 treasury operations. The Corporate Director, Resources will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:
- if it was felt that there was a significant risk of a sharp FALL in long and short term rates (e.g. due to a marked increase of risks around relapse into recession or of risks of deflation), then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.
  - if it was felt that there was a significant risk of a much sharper RISE in long and short term rates than that currently forecast, perhaps arising from a greater than expected increase in the anticipated rate to US tapering of asset purchases, or in world economic activity or a sudden increase in inflation risks, then the portfolio position will be re-appraised with the likely action that fixed rate funding will be drawn whilst interest rates are still lower than they will be in the next few years.
- 6.3 Any decisions will be reported to the Cabinet and the full Council at the next available opportunity.
- 6.4 The Council's borrowing strategy will give consideration to new borrowing in the following order of priority: -
- The cheapest borrowing will be internal borrowing by running down cash balances and foregoing interest earned at historically low rates. However, in view of the overall forecast for long term borrowing rates to increase over the next few years, consideration will also be given to weighing the short term advantage of internal borrowing against potential long term costs if the opportunity is missed for taking loans at long term rates which will be higher in future years.
  - Temporary borrowing from the money markets or other local authorities
  - PWLB variable rate loans for up to 10 years
  - Short dated borrowing from non PWLB below sources
  - Long term fixed rate market loans at rates significantly below PWLB rates for the equivalent maturity period (where available) and to maintaining an appropriate balance between PWLB and market debt in the debt portfolio.
  - PWLB borrowing for periods under 10 years where rates are expected to be significantly lower than rates for longer periods. This offers a range of options for new borrowing which will spread debt maturities away from a concentration in longer dated debt
- 6.5 The Council will continue to borrow in respect of the following:
- Maturing debt (net of minimum revenue provision).



- Approved unsupported (prudential) capital expenditure.
- To finance cash flow in the short term.

6.6 The type, period, rate and timing of new borrowing will be determined by the Corporate Director Resources under delegated powers, taking into account the following factors:

- Expected movements in interest rates as outlined above.
- Current maturity profile.
- The impact on the medium term financial strategy.
- Prudential indicators and limits.

6.7 **Treasury management limits on borrowing activity** - There are three debt related treasury activity indicators. The purpose of these are to restrain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set to be too restrictive they will impair the opportunities to reduce costs / improve performance. The indicators are:

- **Upper limits on variable interest rate exposure** - This identifies a maximum limit for variable interest rates based upon the debt position net of investments
- **Upper limits on fixed interest rate exposure** - This is similar to the previous indicator and covers a maximum limit on fixed interest rates;
- **Maturity structure of borrowing** - These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.

**The Council is asked to approve the following treasury indicators and limits:**

	2018/19 £m	2019/20 £m	2020/21 £m
<b>Interest rate exposures</b>			
Upper limits on fixed interest rates based on net debt	450	450	450
Upper limits on variable interest rates based on net debt	450	450	450
<b>Maturity structure of fixed interest rate borrowing 2018/19</b>			
	<b>Lower</b>	<b>Upper</b>	
Under 12 months	0%	10%	
12 months to 2 years	0%	30%	
2 years to 5 years	0%	40%	
5 years to 10 years	0%	80%	
10 years and above	0%	100%	

6.8 The Council measures and manages its exposures to treasury management risks using the following indicators and also detailed in Appendix 1 of this report.

- **Authorised Limit for External Debt** – The upper limit on the level of gross external debt permitted. It must not be breached without Full Council approval.

**The Council is asked to approve the following authorised limit:**

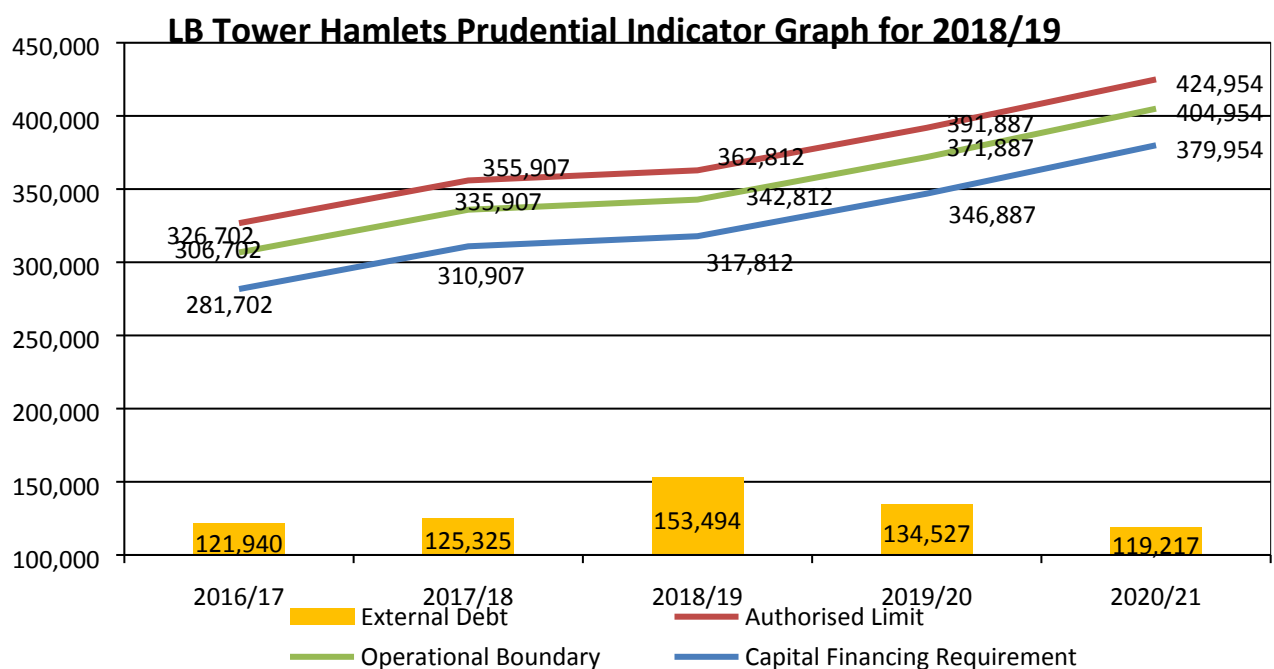
Authorised limit £m	2017/18 Projected Outturn	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
Borrowing & OLTL	335.907	342.812	371.887	404.954
Headroom	20.000	20.000	20.000	20.000
<b>Total</b>	<b>355.907</b>	<b>362.812</b>	<b>391.887</b>	<b>424.954</b>

- **Operational Boundary for External Debt** – Most likely and prudent view on the level of gross external debt requirement. Debt includes external borrowings and other long term liabilities (OLTL).

Operational Boundary £m	2017/18 Projected Outturn	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
Debt	300.950	309.397	340.403	375.606
OLTL	34.957	33.415	31.484	29.348
<b>Total</b>	<b>335.907</b>	<b>342.812</b>	<b>371.887</b>	<b>404.954</b>

- **HRA Debt Limit** – The HRA Self Financing regime came into effect on 1 April 2012. The new regime imposes a maximum HRA CFR on the Council. For this Council this has been set at £184m following repayment of HRA debt totalling £236.2m by the Government as part of debt settlement that preceded the implementation of the HRA Self Financing regime. In 2014, as part of the Local Growth Fund LBTH was awarded £8.225m of additional HRA borrowing capacity, so in effect the HRA debt cap is currently £192m.

HRA Debt Limit £m	2017/18 Projected Outturn	2018/19 Estimate	2019/20 Estimate	2020/21 Estimate
HRA debt cap	192.000	192.000	192.000	192.000
HRA CFR	78.360	82.957	93.548	120.849
<b>HRA Headroom</b>	<b>113.640</b>	<b>109.043</b>	<b>98.452</b>	<b>71.151</b>





- 6.8 **Policy on borrowing in advance of need** - The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.
- 6.9 Borrowing in advance will be made within the constraints that:
- It will be limited to no more than 75% of the expected increase in borrowing need (CFR) over the three year planning period; and
  - Would not look to borrow more than 18 months in advance of need.
- 6.10 Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual outturn reporting mechanism.
- 6.11 **Debt rescheduling** - As short term borrowing rates will be considerably cheaper than longer term fixed interest rates, there may be potential opportunities to generate savings by switching from long term debt to short term debt. However, these savings will need to be considered in the light of the current treasury position and the size of the cost of debt repayment (premiums incurred).
- 6.12 The reasons for any rescheduling to take place will include:
- the generation of cash savings and / or discounted cash flow savings;
  - helping to fulfil the treasury strategy;
  - enhance the balance of the portfolio (amend the maturity profile and/or the balance of volatility).
- 6.13 Consideration will also be given to identify if there is any residual potential for making savings by running down investment balances to repay debt prematurely as short term rates on investments are likely to be lower than rates paid on current debt.
- 6.14 All rescheduling will be reported to the Cabinet and Council, at the earliest meeting following its implementation.

## **7. ANNUAL INVESTMENT STRATEGY**

- 7.1 **Investment policy** - The Council's investment policy has regard to the CLG's Guidance on Local Government Investments ("the Guidance") and the revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes ("the CIPFA TM Code"). The Council's investment priorities will be security first, liquidity second, then return.
- 7.2 In order to minimise the risk to investments, the Council applies minimum acceptable credit criteria in order to generate a list of highly creditworthy counterparties which also enables diversification and thus avoidance of concentration risk.
- 7.3 Ratings will not be the sole determinant of the quality of an institution as it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. The Council will engage with its advisors to maintain a monitor on market pricing such as "credit default swaps" and overlay that information on top of the credit ratings.
- 7.4 Other information sources used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
- 7.5 Investment instruments identified for use and the criteria for selecting counterparty for this financial year are stated in section 7.10 to 7.34.
- 7.6 **In summary** – considering the factors set out in Paragraphs 4-7, the recommended Investment Strategy is that:
- I. The cash balances, not immediately required to finance expenditure, are lent to the money market or invested in pooled funds for the most appropriate periods as indicated by the cash flow forecast and current market and economic conditions;
  - II. Liquidity is maintained by the use of overnight deposits, MMF and call accounts;
  - III. The minimum amount of short-term cash balances required to support monthly cash flow management is £75 million;
  - IV. The upper limit for investments longer than one year is £150 million;
  - V. The maximum period for longer term lending is 5 years;
  - VI. All investment with institutions and investment schemes is undertaken in accordance with the Council's creditworthiness criteria as set out at section 7;
  - VII. More cautious investment criteria are maintained during times of market uncertainty;
  - VIII. All investment with institutions and investment schemes is limited to the types of investment set out under the Council's approved "Specified" and "Non-Specified" Investments detailed at section 7, and that professional advice continues to be sought where appropriate;
  - IX. All investment is managed within the Council's approved investment/asset class limits.

### **Creditworthiness Policy**

- 7.7 The primary principle governing the Council's investment criteria is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle, the Council will ensure that:
- It maintains a policy covering both the categories of investment types it will invest in, criteria for choosing investment counterparties with adequate security, and monitoring their security. This is set out in the specified and non-specified investment sections below; and
  - It has sufficient liquidity in its investments. For this purpose it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the Council's prudential indicators covering the maximum principal sums invested.
- 7.8 The Corporate Director, Resources will maintain a counterparty list in compliance with the following criteria and will revise the criteria and submit them to Council for approval as necessary. These criteria are separate to that which determines which types of investment instrument are either specified or non-specified as it provides an overall pool of counterparties considered high quality which the Council may use, rather than defining what types of investment instruments are to be used.
- 7.9 **Credit rating:** Investment limits are set by reference to the lowest published long-term credit rating from Fitch, Moody's or Standard & Poor's. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be taken into account.
- 7.10 **Banks unsecured:** Accounts, deposits, certificates of deposit and senior unsecured bonds with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail.
- 7.11 **Banks secured:** Covered bonds, reverse repurchase agreements (Repo) and other collateralised arrangements with banks and building societies. These investments are secured on the bank's assets, which limits the potential losses in the unlikely event of insolvency, and means that they are exempt from bail-in. Where there is no investment specific credit rating, but the collateral upon which the investment is secured has a credit rating, the higher of the collateral credit rating and the counterparty credit rating will be used to determine cash and time limits. The combined secured and unsecured investments in any one bank will not exceed the cash limit for secured investments.
- 7.12 **Government:** Loans, bonds and bills issued or guaranteed by national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in, and there is an insignificant risk of insolvency. Investments with the UK Central Government may be made in unlimited amounts for up to 50 years.
- 7.13 **Corporates:** Loans, bonds and commercial paper issued by companies other than banks and registered providers. These investments are not subject to bail-in, but are exposed to the risk of the company going insolvent. Loans to unrated companies will only be made following an internal or external credit assessment to

a maximum of £5m per company as part of a diversified pool in order to spread the risk widely.

- 7.14 **Registered providers:** Loans and bonds issued by, guaranteed by or secured on the assets of registered providers of social housing, formerly known as housing associations. These bodies are tightly regulated by the Homes and Communities Agency and, as providers of public services; they retain the likelihood of receiving government support if needed.
- 7.15 Pooled funds: Shares in diversified investment vehicles consisting of the any of the above investment types, plus equity shares and property. These funds have the advantage of providing wide diversification of investment risks, coupled with the services of a professional fund manager in return for a fee. Short-term Money Market Funds that offer same-day liquidity and very low or no volatility will be used as well as instant access bank accounts, while pooled funds whose value changes with market prices and/or have a notice period will be used for longer investment periods.
- 7.16 Bond, equity and property funds offer enhanced returns over the longer term, but are more volatile in the short term. These allow the Council to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives will be monitored regularly.
- 7.17 **Risk assessment and credit ratings:** Credit ratings are obtained and monitored by the Council's treasury advisers, who will notify changes in ratings as they occur. Where an entity has its credit rating downgraded so that it fails to meet the approved investment criteria then:
- no new investments will be made,
  - any existing investments that can be recalled or sold at no cost will be, and
  - full consideration will be given to the recall or sale of all other existing investments with the affected counterparty.
- 7.18 Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as "rating watch negative" or "credit watch negative") so that it may fall below the approved rating criteria, then only investments that can be withdrawn on the next working day will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.
- 7.19 **Other information on the security of investments:** The Council understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations, in which it invests, including credit default swap prices, financial statements, information on potential government support and reports in the quality financial press. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may meet the credit rating criteria.

- 7.20 When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2011, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Council will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. If these restrictions mean that insufficient commercial organisations of high credit quality are available to invest the Council's cash balances, then the surplus will be deposited with the UK Government, via the Debt Management Office or invested in government treasury bills for example, or with other local authorities. This will cause a reduction in the level of investment income earned, but will protect the principal sum invested.
- 7.21 Specified investments: The CLG Guidance defines specified investments as those:
- denominated in pound sterling,
  - due to be repaid within 12 months of arrangement,
  - not defined as capital expenditure by legislation, and
  - invested with one of:
    - the UK Government,
    - a UK local authority, parish council or community council, or
    - a body or investment scheme of "high credit quality".
- 7.22 The Council defines "high credit quality" organisations and securities as those having a credit rating of A- or higher that are domiciled in the UK or a foreign country with a sovereign rating of AAA. For money market funds "high credit quality" is defined as those having a credit rating of AAA and for other pooled funds and enhanced cash funds "high credit quality" is defined as those having a credit rating of A- or higher.
- 7.23 **Non-specified investments:** Any investment not meeting the definition of a specified investment is classed as non-specified. The Council does not intend to make any investments denominated in foreign currencies, nor any that are defined as capital expenditure by legislation, such as company shares. Non-specified investments will therefore be limited to long-term investments, i.e. those that are due to mature 12 months or longer from the date of arrangement, and investments with bodies and schemes not meeting the definition on high credit quality.
- 7.24 Credit rating information is supplied by Arlingclose Ltd, the Council treasury adviser, on all active counterparties that comply with the criteria mentioned above. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating watches (notification of a likely change), rating outlooks (notification of a possible longer term change) are provided to officers almost immediately after they occur and this information is considered before dealing. This does not apply to the unrated building societies or banks whereby they are selected based on enhanced credit analysis.
- 7.25 The criteria for providing a pool of high quality investment counterparties (both specified and non-specified investments) are:
- 1) Banks with good credit quality – the Council will only use banks which:



- i. are UK banks; and/or
- ii. are non-UK and domiciled in a country which has a minimum sovereign Long Term rating of AAA

And have, as a minimum, Fitch Long Term; 'A-', or Moody's A3, or Standard and Poor's A-.

- 2) Part nationalised UK banks – Lloyds Banking Group and Royal Bank of Scotland. These banks can be included if they continue to be part nationalised or they meet the ratings for financial institutions as stated above.
- 3) The Council's own banker for transactional purposes if the bank falls below the above criteria, although in this case balances will be minimised in both monetary size and time.
- 4) Unrated/Challengers Banks – The Council in conjunction with the advisers' parameters and methodology will use unrated banks with assets in excess of £1.5bn. When investing with such institution, the Council or and its adviser will carry out an enhanced credit analysis in understanding the institution, its financials and credit capabilities.
  - I. The "RAG" framework will be used for Building societies as well as Banks, for the Council to evaluate and compare security and liquidity of investment opportunities.
  - II. The "RAG" (Red, Amber or Green) indicator framework is generally used to identify the strength of a company's financial numbers.
  - III. For example, all the financials there will be pre-set categories which will classify institutions outcomes as Red, Amber or Green. These pre-set categories are industry dependent; e.g. a retail company is expected to generate higher cash flow than a bank.
- 5) Building societies - The Council will use all building societies in the UK which:
  - iii. Meet the ratings for banks outlined above;
  - iv. Have assets in excess of £1.5bn; or meet both criteria.
- 6) Money Market Funds (MMF) – AAA
- 7) Enhanced Money Market Funds (EMMFs) – AA
- 8) Certificates of Deposits (CDs)
- 9) Floating Rate Notes (FRN), Corporate Bonds and Loans
- 10) Reverse Repurchase (Repo)
- 11) Pooled Funds (Property, Bond, Equity, Income, Growth & Diversified Funds)
- 12) Covered Bonds
- 13) Commercial Papers
- 14) Asset Backed Securities
- 15) Registered Social Landlord
- 16) UK Government (including gilts, treasury bills and the Debt management Account Deposit Facility, (DMADF))

- 17) Local authorities, parish councils, Police and Fire Authorities
- 18) Supranational institutions

7.26 **The Council is asked to approve the minimum credit rating required for an institution to be included in the Council’s counterparty list as follows:**

Agency	Long-Term
Fitch	A-
Moody’s	A3
Standard & Poor’s	A-
Sovereign Rating	AAA
Money Market Fund	AAA

7.27 **Country and Product considerations** - Due care will be taken to consider the country, group and sector exposure of the Council’s investments. In part, the country selection will be chosen by the credit rating of the sovereign state in Banks above. In addition:

- No more than a maximum amount of £120m or 25% of the investments portfolio will be placed with any non-UK country with AAA sovereign rating at any time;
- limits in place above will apply to a group of institutions within a non UK country;
- Product limits will be monitored regularly for appropriateness.

7.28 **Use of additional information other than credit ratings** – Additional requirements under the Code requires the Council to supplement credit rating information. Whilst the above criteria relies primarily on the application of credit ratings to provide a pool of appropriate counterparties for officers to use, additional operational market information will be applied before making any specific investment decision from the agreed pool of counterparties. This additional market information are for example Credit Default Swaps, negative rating watches/outlooks, these will be applied to compare the relative security of differing investment counterparties.

**Time and monetary limits applying to investments**

7.29 **Specified Investments:** It is recommended that the Council should make Specified investment as detailed below, all such investments will be sterling denominated, with maturities up to maximum of 1 year, meeting the minimum ‘high credit’ quality criteria where applicable. The Council will continue its policy of lending surplus cash to counterparties that have high credit ratings, defining ‘high credit rating’ as being A- Fitch long-term credit rating or equivalent Moody’s or Standard and Poor’s rating.

Specified Investments	Fitch Long term Rating (or equivalent)	Money Limit	Time Limit
Term Deposits (Banks - higher quality)	Long-term AA	£30m	1 year

Term Deposits (Banks – medium (high) quality)	<i>Long-term A+</i>	£30m	1 year
Term Deposits (Banks – medium (low) quality)	<i>Long-term A</i>	£30m	1 year
Term Deposits (Banks - lower quality)	<i>Long-term A-</i>	£20m	6 months
Banks - part nationalised (per group)	N/A	£70m	1 year
Council's banker (not meeting lending criteria)	XXX	£30m	1 day
DMADF	N/A	Unlimited	6 months
Local authorities, Police & Fire Authorities and Parish Councils,	N/A	£30m	1 year
Treasury Bills (Non UK)	Long Term AA	£30m	1 year
UK Government Gilts	N/A	No Limit	1 year
Corporate Bonds & Loans, FRN and Asset Backed Securities	As Term Deposits above	As Term Deposits above	As Term Deposits above
Certificates of Deposits, Commercial paper & Repo	As Term Deposits above	As Term Deposits above	As Term Deposits above
<b>Collective Investment Schemes structured as Open Ended Investment Companies (OEICs)</b>			
	<b>Fund rating</b>	<b>Money Limit (per fund)</b>	<b>Time Limit</b>
Money market funds (Sterling)	AAA	£25m	liquid
Enhanced Cash Funds	AAA/V1- AA/V2	£20m	liquid
Pooled Funds (Bonds, Equity, Property, Diversified, Growth & Income Funds etc.)	N/A	£20m	liquid

**Non-Specified Investments:**

- 7.30 All investments that do not qualify as specified investments are termed non-specified investments. The table below details the total percentage of the Annual Principal Sums that can be Invested for more than 1 year and can be held in each category of investment, for example 100% of the Principal Sums limit can be held with the UK Government at any one time.
- 7.31 **Unrated banks, building societies and other institutions** are classed as non-specified investments irrespective of the investment period. When investing with this institution, the Council will carry out an enhanced credit analysis in understanding the institution, its financials and credit capabilities.



**Minimum Criteria for considering Unrated Institutions with money and time limits:**

	<b>Institution Assets Value</b>	<b>Money Limit</b>	<b>Time Limit</b>
Unrated UK Building Societies & Challenger Banks with assets in excess of:	£1.5bn £2.5bn	£3m £5m	6 months 12 months

- 7.32 It is considered that the maximum nominal value of overall investments that the Council should hold for more than one year and less than 5 years is £150m. (Investments with maturity over one year) **The prudential indicator figure of £150m is therefore recommended.**
- 7.33 **Approved counterparties:** The Council may invest its surplus funds with any of the counterparty types in the table below, subject to the cash limits (per counterparty) and the time limits shown.

**Approved investment counterparties and limits**

<b>Credit rating</b>	<b>Banks unsecured</b>	<b>Banks secured</b>	<b>Government</b>	<b>Corporates</b>	<b>Registered Providers</b>
UK Govt	n/a	n/a	£ Unlimited 5 years	n/a	n/a
AAA	£20m 5 years	£30m 5 years	£30m 5 years	£20m 5 years	£20m 5 years
AA+	£20m 5 years	£30m 5 years	£30m 5 years	£20m 5 years	£20m 5 years
AA	£20m 4 years	£30m 5 years	£30m 5 years	£20m 5 years	£20m 5 years
AA-	£20m 3 years	£30m 4 years	£30m 5 years	£20m 4 years	£20m 5 years
A+	£20m 2 years	£30m 3 years	£20m 5 years	£20m 3 years	£20m 5 years
A	£20m 13 months	£30m 2 years	£20m 5 years	£20m 2 years	£20m 5 years
A-	£20m 6 months	£30m 13 months	£20m 5 years	£20m 13 months	£20m 5 years
None	£3m - £5m 6 -12 months	n/a	£20m 5 years	£5m 5 years	£20m 5 years
<b>Pooled funds</b>	£20m per fund				
<b>Money Market Funds</b>	£25m per fund				

- 7.34 **Country limits:** The Council has determined that it will only use approved counterparties from non UK countries with a minimum sovereign credit rating of AAA from Fitch (or equivalent). A counterparty list will be compiled based on this sovereign rating of AAA and in accordance with the Council's minimum credit rating criteria policy for institutions and qualified institutions will be added to this list, and unqualified institutions will be removed from the list, by officers as deemed appropriate. Please see Appendix A for qualified countries and their institutions as of 31/01/2018.

## APPENDICES

*Appendix A – Counter Party Credit Rating List*

*Appendix 1 – Prudential and Treasury Indicators*

*Appendix 2 – Definition of Credit Ratings*

*Appendix 3 – Treasury Management Policy Statement*

*Appendix 4 – Treasury Management Scheme of Delegation*

*Appendix 5 – Treasury Management Reporting Arrangement*

*Appendix 6 - Glossary*

### **Local Government Act, 1972 Section 100D (As amended)**

#### **List of “Background Papers” used in the preparation of this report**

**Brief description of “background papers”**

**Name and telephone number of holder  
and address where open to inspection.**

*Bola Tobun, x4733, Mulberry Place*

**PRUDENTIAL AND TREASURY MANAGEMENT INDICATORS FOR 2018/19**

Prudential Indicators	2016/17	2017/18	2017/18	2018/19	2019/20	2020/21
Extract from Estimate and rent setting reports	Actual	Original Estimate	Revised Estimate	Estimate	Estimate	Estimate
	£m	£m	£m	£m	£m	£m
<b>Capital Expenditure</b>						
General Fund	30.333	103.151	127.105	68.700	113.131	98.656
HRA	51.412	113.120	55.322	47.162	55.850	58.340
<b>TOTAL</b>	<b>81.745</b>	<b>216.271</b>	<b>182.427</b>	<b>115.862</b>	<b>168.981</b>	<b>156.996</b>
<b>Ratio of Financing Costs to Net Revenue Stream</b>						
General Fund	1.06%	0.88%	0.74%	0.71%	0.71%	0.68%
HRA	4.18%	6.10%	4.94%	6.01%	7.26%	8.42%
	£m	£m	£m	£m	£m	£m
<b>Gross Debt and Capital Financing Requirement</b>						
Gross Debt	121.940	119.317	158.215	134.166	148.146	128.830
Capital Financing Requirement	281.702	271.605	310.907	317.812	346.887	379.954
Over/(Under) Borrowing	(159.762)	(152.288)	(152.692)	(183.645)	(198.741)	(251.124)
<b>In Year Capital Financing Requirement</b>						
General Fund	0.000	1.855	36.156	9.434	15.099	19.402
HRA	0.000	21.804	0.000	4.597	10.591	27.301
<b>TOTAL</b>	<b>0.000</b>	<b>23.659</b>	<b>36.156</b>	<b>14.031</b>	<b>25.690</b>	<b>46.703</b>
<b>Capital Financing Requirement as at 31 March</b>						
General Fund	203.342	171.441	232.547	234.855	253.339	259.105
HRA	78.360	100.164	78.360	82.957	93.548	120.849
<b>TOTAL</b>	<b>281.702</b>	<b>271.605</b>	<b>310.907</b>	<b>317.812</b>	<b>346.887</b>	<b>379.954</b>
<b>Incremental Impact of Financing Costs (£)</b>						
Increase in Council Tax (band D) per annum	19.079	30.220	30.220	34.984	38.361	40.292
Increase in average housing rent per week	5.837	2.858	1.343	1.588	1.921	0.000

Treasury Management Indicators	2016/17	2017/18	2017/18	2018/19	2019/20	2020/21
	Actual	Original Estimate	Revised Estimate	Estimate	Estimate	Estimate
	£m	£m	£m	£m	£m	£m
<b>Authorised Limit For External Debt -</b>						
Borrowing & Other long term liabilities	306.702	296.605	335.907	342.812	371.887	404.954
Headroom	20.000	20.000	20.000	20.000	20.000	20.000
<b>TOTAL</b>	<b>326.702</b>	<b>316.605</b>	<b>355.907</b>	<b>362.812</b>	<b>391.887</b>	<b>424.954</b>
<b>Operational Boundary For External Debt -</b>						
Borrowing	270.398	261.648	300.950	309.397	340.403	375.606
Other long term liabilities	36.304	34.957	34.957	33.415	31.484	29.348
<b>TOTAL</b>	<b>306.702</b>	<b>296.605</b>	<b>335.907</b>	<b>342.812</b>	<b>371.887</b>	<b>404.954</b>
<b>Gross Borrowing</b>	<b>121.940</b>	<b>119.317</b>	<b>158.215</b>	<b>134.166</b>	<b>148.146</b>	<b>128.830</b>
<b>HRA Debt Limit*</b>	<b>192.000</b>	<b>192.000</b>	<b>192.000</b>	<b>192.000</b>	<b>192.000</b>	<b>192.000</b>
<b>Upper Limit For Fixed Interest Rate Exposure</b>						
Net principal re fixed rate borrowing / investments	<b>100%</b>	<b>100%</b>	<b>£450m</b>	<b>£450m</b>	<b>£450m</b>	<b>£450m</b>
<b>Upper Limit For Variable Rate Exposure</b>						
Net interest payable on variable rate borrowing / investments	<b>50%</b>	<b>50%</b>	<b>£450m</b>	<b>£450m</b>	<b>£450m</b>	<b>£450m</b>
<b>Upper limit for total principal sums invested for over 364 days (per maturity date)</b>	<b>£100m</b>	<b>£100m</b>	<b>£100m</b>	<b>£150m</b>	<b>£150m</b>	<b>£150m</b>

Maturity structure of new fixed rate borrowing during 2018/19	Upper Limit	Lower Limit
under 12 months	10%	0%
12 months and within 24 months	30%	0%
24 months and within 5 years	40%	0%
5 years and within 10 years	80%	0%
10 years and above	100%	0%

Support Ratings

Rating	Current Definition (December 2014)
1	A bank for which there is an extremely high probability of external support. The potential provider of support is very highly rated in its own right and has a very high propensity to support the bank in question. This probability of support indicates a minimum Long-term rating floor of 'A-'.
2	A bank for which there is a high probability of external support. The potential provider of support is highly rated in its own right and has a high propensity to provide support to the bank in question. This probability of support indicates a minimum Long-term rating floor of 'BBB-'.
3	A bank for which there is a moderate probability of support because of uncertainties about the ability or propensity of the potential provider of support to do so. This probability of support indicates a minimum Long-term rating floor of 'BB-'.
4	A bank for which there is a limited probability of support because of significant uncertainties about the ability or propensity of any possible provider of support to do so. This probability of support indicates a minimum Long-term rating floor of 'B'.
5	A bank for which external support, although possible, cannot be relied upon. This may be due to a lack of propensity to provide support or to very weak financial ability to do so. This probability of support indicates a Long-term rating floor no higher than 'B-' and in many cases no floor at all.

Short-term Ratings

Rating	Current Definition (December 2014)
F1	<b>Highest short-term credit quality.</b> Indicates the strongest capacity for timely payment of financial commitments; may have an added "+" to denote any exceptionally strong credit feature.
F2	<b>Good short-term credit quality.</b> A satisfactory capacity for timely payment of financial commitments, but the margin of safety is not as great as in the case of the higher ratings.
F3	<b>Fair short-term credit quality.</b> The capacity for timely payment of financial commitments is adequate; however, near-term adverse changes could result in a reduction to non-investment grade.

## Long -term Ratings

Rating	Current Definition (December 2014)
<b>AAA</b>	<b>Highest credit quality</b> - 'AAA' ratings denote the lowest expectation of credit risk. They are assigned only in case of exceptionally strong capacity for timely payment of financial commitments. This capacity is highly unlikely to be adversely affected by foreseeable events.
<b>AA</b>	<b>Very high credit quality</b> - 'AA' ratings denote a very low expectation of credit risk. They indicate very strong capacity for timely payment of financial commitments. This capacity is not significantly vulnerable to foreseeable events.
<b>A</b>	<b>High credit quality</b> - 'A' ratings denote a low expectation of credit risk. The capacity for timely payment of financial commitments is considered strong. This capacity may, nevertheless, be more vulnerable to changes in circumstances or in economic conditions than is the case for higher ratings.
<b>BBB</b>	<b>Good credit quality</b> - 'BBB' ratings indicate that there is currently a low expectation of credit risk. The capacity for timely payment of financial commitments is considered adequate, but adverse changes in circumstances and in economic conditions is more likely to impair this capacity. This is the lowest investment-grade category.
<b>BB</b>	<b>Speculative</b> - 'BB' ratings indicate an elevated vulnerability to default risk, particularly in the event of adverse changes in business or economic conditions over time; however, business or financial flexibility exists which supports the servicing of financial commitments.
<b>B</b>	<b>Highly speculative</b> - 'B' ratings indicate that material default risk is present, but limited margin of safety remains. Financial commitments are currently being met however, capacity for continued payment is vulnerable to deterioration in the business and economic environment.
<b>CCC</b>	<b>Substantial credit risk</b> – 'CCC' Default is a real possibility.
<b>CC</b>	<b>Very high levels of credit risk</b> – 'CC' Default of some kind appears probable
<b>C</b>	<b>Exceptionally high levels of credit risk</b> Default is imminent or inevitable, or the issuer is in standstill. Conditions that are indicative of a 'C' category rating for an issuer include: a. the issuer has entered into a grace or cure period following non-payment of a material financial obligation; b. the issuer has entered into a temporary negotiated waiver or standstill agreement following a payment default on a material financial obligation; or c. Fitch Ratings otherwise believes a condition of 'RD' or 'D' to be imminent or inevitable, including through the formal announcement of a distressed debt exchange. (RD – stands for restricted default and D – default).

Note:

The modifiers "+" or "-" may be appended to a rating to denote relative status within major rating categories. Such suffixes are not added to the 'AAA' Long-Term IDR category, or to Long-Term IDR categories below 'B'.

## Treasury Management Policy Statement

The London Borough of Tower Hamlets defines the policies and objectives of its treasury management activities as follows: -

1. This organisation defines its treasury management activities as:  
“The management of the authority’s cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks”.
2. This organisation regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on their risk implications for the organisation.
3. This organisation acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving best value in treasury management, and to employing suitable performance measurement techniques, within the context of effective risk management.”

### Policy on use of an External Treasury Advisor

The Council shall employ an external treasury advisor to provide treasury management advice and cash management support services. However, the Council shall control the credit criteria and the associated counter-party list for investments.

The Council recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.

## Treasury Management Scheme of Delegation

### 1. Full Council / Cabinet

- receiving and reviewing reports on treasury management policies, practices and activities
- receiving the mid-year and annual (outturn) reports
- approval of annual strategy.

### 2. Cabinet /Section 151 Officer

- approval of/amendments to the organisation's adopted clauses and treasury management policy statement
- budget consideration and approval
- approval of the division of responsibilities
- approving the selection of external service providers and agreeing terms of appointment.

### 3. Audit Committee

- reviewing the treasury management policy and procedures and making recommendations to the responsible body.
- receiving and reviewing regular monitoring reports and acting on recommendations



## Appendix 5

### Treasury Management Reporting Arrangement

Area of Responsibility	Council/Committee/ Officer	Frequency
Treasury Management Strategy Statement/ Annual Investment Strategy/ Minimum Revenue Provision Policy	Full Council	Annually before the start of the financial year to which policies relate
Mid-Year Treasury Management Report	Full Council	Semi-Annually in the financial year to which policies relate
Updates or revisions to the Treasury Management Strategy Statement/ Annual Investment Strategy/ Minimum Revenue Provision Policy	Audit Committee or Full Council	As necessary
Annual Treasury Outturn Report	Audit Committee and Full Council	Annually by 30 September after the year end to which the report relates
Treasury Management Practices	Corporate Director, Resources	N/A
Scrutiny of Treasury Management Strategy Statement	Overview and Scrutiny Committee (if called in) / Audit Committee	Annually before the start of the financial year to which the report relates
Scrutiny of Treasury Management Performance	Audit Committee	Quarterly

## Appendix 6 - GLOSSARY

Asset Life	How long an asset, e.g. a Council building is likely to last.
Borrowing Portfolio	A list of loans held by the Council.
Borrowing Requirements	The principal amount the Council requires to borrow to finance capital expenditure and loan redemptions.
Capitalisation direction or regulations	Approval from central government to fund certain specified types of revenue expenditure from capital resources.
CIPFA Code of Practice on Treasury Management	A professional code of Practice which regulates treasury management activities.
Capital Financing Requirement (CFR)	Capital Financing Requirement- a measure of the Council's underlying need to borrow to fund capital expenditure.
Certificates of Deposits	A certificate of deposit (CD) is a time deposit, a financial product. CDs are similar to savings accounts in that they are insured and thus virtually risk free; they are "money in the bank." They are different from savings accounts in that the CD has a specific, fixed term (often monthly, three months, six months, or one to five years) and, usually, a fixed interest rate. It is intended that the CD be held until maturity, at which time the money may be withdrawn together with the accrued interest.
Commercial paper	Commercial paper is a money-market security issued (sold) by large corporations to obtain funds to meet short-term debt obligations (for example, payroll), and is backed only by an issuing bank or corporation's promise to pay the face amount on the maturity date specified on the note. Since it is not backed by collateral, only firms with excellent credit ratings from a recognized credit rating agency will be able to sell their commercial paper at a reasonable price. Commercial paper is usually sold at a discount from face value, and carries higher interest repayment rates than bonds
Counterparties	Organisations or Institutions the Council lends money to e.g. Banks; Local Authorities and MMF.
Corporate bonds	A corporate bond is a bond issued by a corporation. It is a bond that a corporation issues to raise money effectively in order to expand its business. The term is usually applied to longer-term debt instruments, generally with a maturity date falling at least a year after their issue date.
Covered bonds	A covered bond is a corporate bond with one important enhancement: recourse to a pool of assets that secures or "covers" the bond if the originator (usually a financial institution) becomes insolvent. These assets act as additional credit cover; they do not have any bearing on the contractual cash flow to the investor, as is the case with Securitized assets.

Consumer Prices Index & Retail Prices Index (CPI & RPI)	The main inflation rate used in the UK is the CPI. The Chancellor of the Exchequer bases the UK inflation target on the CPI. The CPI inflation target is set at 2%. The CPI differs from the RPI in that CPI excludes housing costs. Also used is RPIX, which is a variation of RPI, one that removes mortgage interest payments.
Credit Default Swap (CDS)	A kind of protection that can be purchased by MMF companies from insurance companies (for their investment) in exchange for a payoff if the organisation they have invested in does not repay the loan i.e. they default.
Credit watch	Variety of special programs offered by credit rating agencies and financial institutions to monitor organisation/individual's (e.g. bank) credit report for any credit related changes. A credit watch allows the organisation/individuals to act on any red flags before they can have a detrimental effect on credit score/history.
Credit Arrangements	Methods of Financing such as finance leasing
Credit Ratings	A scoring system issued by credit rating agencies such as Fitch, Moody's and Standard & Poors that indicate the financial strength and other factors of a bank or similar Institution.
Creditworthiness	How highly rated an institution is according to its credit rating.
Debt Management Office (DMO)	The DMO is an agency of the HM Treasury which is responsible for carrying out the Government's Debt Management Policy.
Debt Rescheduling	The refinancing of loans at different terms and rates to the original loan.
Depreciation Method	The spread of the cost of an asset over its useful life.
Gilt	Gilt-edged securities are bonds issued by certain national governments. The term is of British origin, and originally referred to the debt securities issued by the Bank of England, which had a gilt (or gilded) edge. Hence, they are known as gilt-edged securities, or gilts for short. Today the term is used in the United Kingdom as well as some Commonwealth nations, such as South Africa and India. However, when reference is made to "gilts", what is generally meant is "UK gilts," unless otherwise specified.
Interest Rate exposures	A measure of the proportion of money invested and what impact movements in the financial markets would have on them.
The International Monetary Fund (IMF)	is an intergovernmental organisation which states its aims as to foster global monetary cooperation, secure financial stability, facilitate international trade, promote high employment and sustainable economic growth, and reduce poverty around the world.
Impaired investment	An investment that has had a reduction in value to reflect

	changes that could impact significantly on the benefits expected from it.
LIBID	The London Interbank Bid Rate – it is the interest rate at which major banks in London are willing to borrow (bid for) funds from each other.
Market Loans	Loans from banks available from the London Money Market including LOBOS (Lender Option, Borrowing Option) which enable the authority to take advantage of low fixed interest for a number of years before an agreed variable rate comes into force.
Money Market Fund (MMF)	A ‘pool’ of different types of investments managed by a fund manager that invests in lightly liquid short term financial instruments with high credit rating.
Monetary Policy Committee (MPC)	Committee designated by the Bank of England, whose main role is to regulate interest rates.
Minimum Revenue Provision (MRP)	This is the amount which must be set aside from the revenue budget each year to cover future repayment of loans.
Non Specified Investments	Investments deemed to have a greater element of risk such as investments for longer than one year
Premium	Cost of early repayment of loan to PWLB to compensate for any losses that they may incur
Prudential Indicators	Set of rules providing local authorities borrowing for funding capital projects under a professional code of practice developed by CIPFA and providing measures of affordability and prudence reflecting the Council’s Capital Expenditure, Debt and Treasury Management.
PWLB	Public Works Loan Board, a statutory body whose function is to lend money to Local Authorities (LAs) and other prescribed bodies. The PWLB normally are the cheapest source of long term borrowing for LAs.
Specified Investments	Investments that meet the Council’s high credit quality criteria and repayable within 12 months.
Supranational bonds	Supranational bonds are issued by institutions that represent a number of countries, not just one. Thus, organisations that issue such bonds tend to be the World Bank or the European Investment Bank. The issuance of these bonds are for the purpose of promoting economic development
Treasury bills (or T-bills)	Treasury bills (or T-bills) mature in one year or less. Like zero-coupon bonds, they do not pay interest prior to maturity; instead they are sold at a discount of the par value to create a positive yield to maturity. Many regard Treasury bills as the least risky investment available.
Unrated institution	An institution that does not possess a credit rating from one of the main credit rating agencies.
Unsupported Borrowing	Borrowing where costs are wholly financed by the Council.



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London Borough of Tower Hamlets Counterparty Credit List														as at: 31/01/2018		
Counterparty	Sovereign Rating	Country of Domicile	FITCH RATINGS					MOODY'S RATINGS				STANDARD & POOR'S RATINGS				
			Short-term	Long-term	Viability	Support	Outlook	Short-term	Long-term	Baseline Credit Assess	Outlook	Short-term	Long-term	Outlook		
<b>UNITED KINGDOM: BANKS</b>																
	AA															
BANK OF SCOTLAND PLC		GB	F1	A+	a	5	STABLE	P-1	Aa3	a3	STABLE	A-1	A	POS		
LLOYDS BANK PLC		GB	F1	A+	a	5	STABLE	P-1	Aa3	a3	STABLE	A-1	A	POS		
BARCLAYS BANK PLC		GB	F1	A**	a	5		P-1	A1	baa2	NEG	A-1	A	STABLE		
CLOSE BROTHERS LTD		GB	F1	A	a	5	STABLE	P-1	Aa3	a2	STABLE					
CLYDESDALE BANK		GB	F2	BBB+	bbb+	5	STABLE	WR	Baa1	baa2	POS	A-2	BBB+	STABLE		
CO-OPERATIVE BANK PLC		GB	B	B-	b-	5	STABLE	NP	Caa2	caa2	POS					
GOLDMAN SACHS INT'L BANK		GB	F1	A			STABLE	P-1	A1	baa3	STABLE	A-1	A+	STABLE		
HSBC BANK PLC		GB	F1+	AA-	a+	1	STABLE	P-1	Aa3	baa1	NEG	A-1+	AA-	STABLE		
NATIONAL WESTMINSTER BANK		GB	F2	BBB+**	bbb+	5		P-2**	A3**	baa3**		A-2	BBB+	POS		
ROYAL BANK OF SCOTLAND PLC/T		GB	F2	BBB+	bbb+	5**	STABLE	P-2*-	A3*-	baa3*-		A-2	BBB+	STABLE		
ULSTER BANK LIMITED		GB	F2	BBB+**	WD	2**		-	A3**	baa3**		A-2	BBB+	POS		
ABBEY NATIONAL TREASURY SERV		GB	F1	A**				P-1			STABLE					
SANTANDER UK PLC		GB	F1	A**	a	2		P-1	Aa3	a3	STABLE	A-1	A	STABLE		
STANDARD CHARTERED BANK		GB	F1	A+	a	5	STABLE	P-1	A1	baa1	STABLE	A-1	A	STABLE		
USB BANK PLC/UNITED KINGDOM		GB							Baa2	baa2	STABLE					
<b>UK: BUILDING SOCIETIES</b>																
COVENTRY BUILDING SOCIETY		GB	F1	A	a	5	STABLE	P-1	A2	a3	STABLE					
BARLINGTON BUILDING SOCIETY		GB														
FURNESS BUILDING SOCIETY		GB														
HINCKLEY & RUGBY BUILDING SOCIETY		GB														
LEEDS BUILDING SOCIETY		GB	F1	A-	a-	5	STABLE	P-2	A3	baa1	STABLE					
LEEK UNITED BUILDING SOCIETY		GB														
LOUGHBOROUGH BUILDING SOCIETY		GB														
MANSFIELD BUILDING SOCIETY		GB														
MARKET HARBOROUGH BUILDING SOCIETY		GB														
MARSDEN BUILDING SOCIETY		GB														
MELTON MOWBRAY BUILDING SOCIETY		GB														
NATIONAL COUNTIES BUILDING SOCIETY		GB														
NATIONWIDE BUILDING SOCIETY		GB	F1	A+	a	5	NEG	P-1	Aa3	a3	STABLE	A-1	A	STABLE		
NEWBURY BUILDING SOCIETY		GB														
SCOTTISH BUILDING SOCIETY		GB														
STAFFORD RAILWAY BUILDING SOCIETY		GB														
TIPTON & COSELEY BUILDING SOCIETY		GB														
YORKSHIRE BUILDING SOCIETY		GB	F1	A-	a-	5	STABLE	P-2	A3	baa1	STABLE	NR	NR			
<b>UK: LOCAL AUTHORITIES</b>																
ABERDEEN CITY COUNCIL		GB							Aa3		STABLE					

London Borough of Tower Hamlets Counterparty Credit List														as at: 31/01/2018		
Counterparty	Sovereign Rating	Country of Domicile	FITCH RATINGS					MOODY'S RATINGS				STANDARD & POOR'S RATINGS				
			Short-term	Long-term	Viability	Support	Outlook	Short-term	Long-term	Baseline Credit Assess	Outlook	Short-term	Long-term	Outlook		
CORNWALL COUNCIL		GB							Aa2		STABLE					
GREATER LONDON AUTHORITY		GB										A-1+	AA	NEG		
GUILDFORD BOROUGH COUNCIL		GB							Aa2		STABLE					
LANCASHIRE COUNTY COUNCIL		GB							Aa3		NEG					
TRANSPORT FOR LONDON		GB	F1+	AA-				NEG	P-1	Aa3	STABLE	A-1+	AA	NEG		
WANDSWORTH BOROUGH COUNCIL		GB	F1+	AA				NEG								
WARRINGTON BOROUGH COUNCIL		GB							A1		NEG					
<b>UK: OTHER INSTITUTIONS</b>																
LCR FINANCE PLC		EN		AA					Aa2		STABLE		AA			
NETWORK RAIL INFRASTRUCTURE		GB	F1+	AA				NEG	P-1	Aa2	STABLE					
UK GOVERNMENT		GB	F1+	AA				NEG		Aa2	STABLE	A-1+u	AAu	NEG		
WELLCOME TRUST FINANCE PLC		GB							Aaa		STABLE		AAA	STABLE		
<b>COMMONWEALTH OF AUSTRALIA</b>																
COMMONWEALTH OF AUSTRALIA	AAA	AU	F1+	AAA				STABLE		Aaa		STABLE	A-1+u	AAAu	NEG	
AUST AND NZ BANKING GROUP		AU	F1+	AA-	aa-	1		STABLE	P-1	Aa3	a2	STABLE	A-1+	AA-	NEG	
COMMONWEALTH BANK OF AUSTRAL		AU	F1+	AA-	aa-	1		STABLE	P-1	Aa3	a2	STABLE	A-1+	AA-	NEG	
NATIONAL AUSTRALIA BANK LTD		AU	F1+	AA-	aa-	1		STABLE	P-1	Aa3	a2	STABLE	A-1+	AA-	NEG	
NEW SOUTH WALES TREASURY COR		AU							P-1	Aaa		STABLE	A-1+	AAA	NEG	
WESTPAC BANKING CORP		AU	F1+	AA-	aa-	1		STABLE	P-1	Aa3	a2	STABLE	A-1+	AA-	NEG	
<b>GOVERNMENT OF CANADA</b>																
GOVERNMENT OF CANADA	AAA	CA	F1+	AAA				STABLE		Aaa		STABLE	A-1+	AAA	STABLE	
BANK OF MONTREAL		CA	F1+	AA-	aa-	2		STABLE	P-1	A1	a3	NEG	A-1	A+	STABLE	
BANK OF NOVA SCOTIA		CA	F1+	AA-	aa-	2		STABLE	P-1	A1	a3	NEG	A-1	A+	STABLE	
CAN IMPERIAL BK OF COMMERCE		CA	F1+	AA-	aa-	2		NEG	P-1	A1	a3	NEG	A-1	A+	STABLE	
EXPORT DEVELOPMENT CANADA		CA							P-1	Aaa		STABLE	A-1+	AAA	STABLE	
ROYAL BANK OF CANADA		CA	F1+	AA	aa	2		STABLE	P-1	A1	a3	NEG	A-1+	AA-	NEG	
TORONTO-DOMINION BANK		CA	F1+	AA-	aa-	2		STABLE	P-1	Aa2	a1	NEG	A-1+	AA-	STABLE	
<b>KINGDOM OF DENMARK</b>																
KINGDOM OF DENMARK	AAA	DE	F1+	AAA				STABLE	P-1	Aaa		STABLE	A-1+	AAA	STABLE	
DANSKE BANK A/S		DE	F1	A	a	5		STABLE	P-1	A1	a3	STABLE	A-1	A	STABLE	
KOMMUNEKREDIT		DE							P-1	Aaa		STABLE	A-1+	AAA	STABLE	
<b>FEDERAL REPUBLIC OF GERMANY</b>																
FEDERAL REPUBLIC OF GERMANY	AAA	GE	F1+	AAA				STABLE		Aaa		STABLE	A-1+u	AAAu	STABLE	
FMS WERTMANAGEMENT		GE	WD	WD				WD	P-1	Aaa		STABLE	A-1+	AAA	STABLE	
KREDITANSTALT FUER WIEFERAUF		GE	F1+	AAA				1	STABLE	P-1		STABLE	A-1+	AAA	STABLE	
LANDESBANK HESSEN-THURINGEN		GE	F1+	A+				WD	STABLE	P-1	A1	baa2	NEG	A-1	A	STABLE
LANDESKRED BADEN-WUERTT FOER		GE	F1+	AAA				1	STABLE	P-1	Aaa	STABLE	A-1+	AAA	STABLE	
LANDWIRTSCHAFTLICHE RENTENBA		GE	F1+	AAA				1	STABLE	P-1	Aaa	STABLE	A-1+	AAA	STABLE	
LAND SACHSEN-ANHALT		GE	F1+	AAA					STABLE	P-1	Aa1	STABLE	A-1+	AA+	STABLE	



London Borough of Tower Hamlets Counterparty Credit List														as at: 31/01/2018		
Counterparty	Sovereign Rating	Country of Domicile	FITCH RATINGS					MOODY'S RATINGS				STANDARD & POOR'S RATINGS				
			Short-term	Long-term	Viability	Support	Outlook	Short-term	Long-term	Baseline Credit Assess	Outlook	Short-term	Long-term	Outlook		
KINGDOM OF THE NETHERLANDS	AAA	NE	F1+	AAA				STABLE	P-1	Aaa			STABLE	A-1+u	AAAu	STABLE
BANK NEDERLANDSE GEMEENTEN		NE	F1+	AA+			1	STABLE	P-1	Aaa	a1		STABLE	A-1+	AAA	STABLE
COOPERATIEVE RABOBANK UA		NE	F1+	AA-	a+		WD	STABLE	P-1	Aa2	a2		NEG	A-1	A+	POS
ING BANK NV		NE	F1	A+	a+		5	STABLE	P-1	Aa3	baa1		STABLE	A-1	A+	STABLE
NEDERLANDSE WATERSCHAPSBANK		NE							P-1		a1		STABLE	A-1+	AAA	STABLE
KINGDOM OF NORWAY	AAA	NO	F1+	AAA				STABLE		Aaa			STABLE	A-1+	AAA	STABLE
KOMMUNALBANKEN AS		NO							P-1	Aaa	a1		STABLE	A-1+	AAA	STABLE
REPUBLIC OF SINGAPORE	AAA	SI	F1+	AAA				STABLE		Aaa			STABLE	A-1+u	AAAu	STABLE
DBS BANK LTD		SI	F1+	AA-	aa-		1	STABLE	P-1	Aa1	a1		STABLE	A-1+	AA-	STABLE
OVERSEA-CHINESE BANKING CORP		SI	F1+	AA-	aa-		1	STABLE	P-1	Aa1	a1		STABLE	A-1+	AA-	STABLE
TEMASEK FINANCIAL I LTD		SI								Aaa			STABLE		AAA	
UNITED OVERSEAS BANK LTD		SI	F1+	AA-	aa-		1	STABLE	P-1	Aa1	a1		STABLE	A-1+	AA-	STABLE
KINGDOM OF SWEDEN	AAA	SW	F1+	AAA				STABLE	P-1	Aaa			STABLE	A-1+u	AAAu	STABLE
NORDEA BANK AB		SW	F1+	AA-	aa-		5	STABLE	P-1	Aa3	a3		STABLE	A-1+	AA-	STABLE
SWEDBANK HYPOTEK AB		SW	WD	WD			WD		(P)P-1	(P)Aa3	a3		STABLE	A-1+	AA-	STABLE
SVENSK EXPORTKREDIT AB		SW							P-1	Aa1	a1		STABLE	A-1+	AA+	STABLE
SVENSKA HANDELSBANKEN-A SHS		SW	F1+	AA	aa		5	STABLE	P-1	Aa2	a2		STABLE	A-1+	AA-	STABLE
SWISS CONFEDERATION	AAA	SZ	F1+	AAA				STABLE		Aaa			STABLE	A-1+u	AAAu	STABLE
CREDIT SUISSE AG		SZ	F1	A	a-		5	STABLE	P-1	A1	baa2		STABLE	A-1	A	STABLE
SUPRANATIONAL																
COUNCIL OF EUROPE DEVELOPMNT		FR	F1+	AA+				STABLE	P-1	Aa1			STABLE	A-1+	AA+	POS
EUROPEAN BANK FOR RECONSTRUC		GB	F1+	AAA				STABLE	P-1	Aaa			STABLE	A-1+	AAA	STABLE
EUROPEAN COAL & STEEL COMMUN		BE								Aaa			STABLE		AAA	STABLE
EUROPEAN INVESTMENT BANK		LX	F1+	AAA				STABLE	P-1	Aaa			STABLE	A-1+	AAA	STABLE
INTER-AMERICAN DEV BANK		US	F1+	AAA				STABLE	(P)P-1	Aaa			STABLE	A-1+	AAA	STABLE
INTERNATIONAL BANK FOR RECON		US	F1+	AAA				STABLE	(P)P-1	Aaa			STABLE	A-1+	AAA	STABLE
INTERNATIONAL FINANCE CORP		US							(P)P-1	(P)Aaa			STABLE	A-1+	AAA	STABLE
NORDIC INVESTMENT BANK		FI							P-1	Aaa			STABLE	A-1+	AAA	STABLE

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<p><b>Council</b></p> <p>21 February 2018</p>	
<p><b>Report of:</b> Ann Sutcliffe, Acting Corporate Director, Place</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits</b></p> <p><b>Submission to the secretary of state for independent examination</b></p>	

<b>Lead Member</b>	<b>Councillor Rachel Blake, Cabinet Member for Strategic Development &amp; Waste</b>
<b>Originating Officer(s)</b>	Marissa Ryan-Hernandez (Strategic Planning Manager) & Philip Wadsworth (Local Plan Place Team Leader)
<b>Wards Affected</b>	All wards
<b>Key Decision?</b>	Yes
<b>Community Plan Theme</b>	<b>A Great Place to Live</b>

## 1 EXECUTIVE SUMMARY

- 1.1 Consultation on the draft Tower Hamlets Local Plan (together with the Integrated Impact Assessment, Policies Map and Statement of Community Involvement Refresh) took place between Monday 2<sup>nd</sup> October and Monday 13<sup>th</sup> November 2017 (known as the regulation 19 stage).
- 1.2 In total, 126 individuals or organisations (including residents, businesses, community groups, government bodies, landowners and developers) responded to the regulation 19 consultation on the Local Plan. Between them they made 948 individual comments. Appendix 2 contains a summary of all the representations received and our response to the issues raised in the consultation.
- 1.3 Appendix 3 sets out a schedule of the minor modifications which respond to some of the issues raised through the consultation. Minor modifications are changes to typographical or grammatical errors, changes to improve clarity or changes to update facts. None of these changes relate to the soundness of the Local Plan and will not need to be considered at the forthcoming public examination.
- 1.4 The purpose of this report is to seek approval to submit the Tower Hamlets Local Plan (together with the Integrated Impact Assessment, supporting evidence base documents and the representations received during the consultation) to the secretary of state for independent public examination in line with regulation 22 of the Town and Country Planning, Local Planning (England) Regulations 2012.

## **2 DECISIONS REQUIRED**

### **2.1 Council is recommended to:**

1. Approve the submission of the regulation 19 version of the Tower Hamlets Local Plan and associated minor amendments table to the secretary of state for independent examination in accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community Involvement;
2. Approve the submission of the documents which support the Tower Hamlets Local Plan and have been developed in accordance with regulation 22 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012. These are:
  - (a) the Integrated Impact Assessment;
  - (b) the Policies Map;
  - (c) the Statement of Consultation;
  - (d) the Duty to Cooperate Statement;
  - (e) the supporting evidence base; and
  - (f) copies of representations made during the regulation 19 consultation and the council's response to them; and
3. Authorise the Corporate Director of Place (Interim) in consultation with the Mayor and Lead Member for Strategic Development and Waste to make any further minor amendments in the minor amendments table.

## **3 REASONS FOR THE DECISION**

- 3.1 Local Plans set a vision and framework for the future development of an area, addressing needs and opportunities, particularly in relation to housing, the economy, infrastructure provision and the protection of the environment. They are also a critical tool in guiding decisions on planning applications.
- 3.2 The National Planning Policy Framework (NPPF) expects local planning authorities to keep plans up-to-date and also review them, in whole or in part, in response to changing circumstances, such as new projections of population and employment growth and changes in national and regional guidance and policies. It also advises local planning authorities to prepare single plans combining strategic and detailed policies.
- 3.3 The Tower Hamlets Strategic Plan sets out a commitment to prepare a new Local Plan in order to appropriately manage and guide development anticipated over the next fifteen years.
- 3.4 The current adopted Local Plan consists of two documents:
  - Core Strategy - this sets out the overarching vision and strategic priorities for the future of the borough (adopted in 2010).
  - Managing Development Document - this sets out more detailed policies to guide development and identifies sites to help deliver the homes and infrastructure we need (adopted in 2013).

- 3.5 Although relatively recent documents, the introduction of new housing and job targets through the existing London Plan (Greater London Authority 2016), along with recent changes to national planning policy and legislation, mean it is appropriate for the council to bring forward a new Local Plan to manage increased growth and respond to emerging trends.
- 3.6 Once adopted, the Local Plan will replace the current policies set out in the Core Strategy and Managing Development Document and will be used to make decisions on planning applications.

## **4 ALTERNATIVE OPTIONS**

### **OPTION A: RETAIN THE EXISTING LOCAL PLAN**

- 4.1 The existing Local Plan has not planned for sufficient infrastructure such as schools, open space and transport to meet the needs arising from the borough's revised annual housing target and projected employment growth set out in the 2016 London Plan.
- 4.2 Without a new and up-to-date Local Plan in place, there is a risk that development will not come forward in a coordinated manner, making it difficult to deliver the social and physical infrastructure necessary to support the anticipated number of new homes and jobs.
- 4.3 By not allocating sufficient sites, the borough could miss out on the benefits of growth to the detriment of local people.
- 4.4 The evidence on which the current Local Plan is based is becoming increasingly out-of-date (for instance, it does not reflect the most up-to-date national and regional policies and legislation). The National Planning Policy Framework / London Plan would become default policies on matters not addressed within the existing Local Plan, meaning local circumstances would not necessarily be reflected to guide planning applications and decisions.
- 4.5 It also means that in some cases the council's ability to successfully defend refusals at appeal would be compromised.

### **OPTION B: PARTIAL REVIEW OF EXISTING LOCAL PLAN (WHILE RETAINING ELEMENTS OF THE NEW LOCAL PLAN)**

- 4.6 The vision set out in the Core Strategy no longer accurately reflects the future challenges, opportunities and aspirations of the council, its partners and the local community, as set out in the Tower Hamlets Partnership Community Plan 2015. As a result, it makes sense that a new vision for the Local Plan be prepared.
- 4.7 The policies in the Local Plan should be read as a whole and should be considered together as part of any review.
- 4.8 Changes to population and new government legislation/guidance have rendered much of the evidence out-of-date.

4.9 With further amendments to planning legislation/government guidance and another new London Plan forthcoming, it is highly likely that a further detailed review of the existing Local Plan would be required in the near future, whereas a whole new Local Plan would have greater longevity and be easier to update should a need arise.

### **OPTION C: DELAY SUBMISSION AND UNDERTAKE FURTHER MAIN MODIFICATIONS AND ANOTHER REGULATION 19 CONSULTATION**

4.10 Reverting back to a previous stage to re-consult on the Local Plan would cause significant delay in the process. Any further consultation would only be considered necessary where fundamental issues concerning the policies have been raised during the regulation 19 consultation with significant implications for the overall direction of the plan which would need to be resolved before the plan can be submitted to the secretary of state. However, this does not represent a credible alternative given the need to urgently bring forward development site allocations alongside supporting infrastructure in order to meet the highest housing target in London and, in turn, positively spread the benefits of this growth across the borough's communities, while protecting the character and distinctiveness of the environment. As explained in section 8 below, none of the representations on the regulation 19 consultation are considered to present fundamental challenges to the overall direction of the plan and in the majority of cases should be able to be addressed through minor modifications.

4.11 Moreover, the government has set out a clear intention to intervene where authorities are failing to make sufficient progress in respect of plan making. As such, significant delay could result in Tower Hamlets losing control of plan making within the borough.

## **5. BACKGROUND**

5.1 The Tower Hamlets Local Plan is the borough's key planning document and is a statutory requirement. It sets out policies to guide future growth and investment, as well as secure benefits from new developments, such as transport improvements, new open spaces and affordable housing. It covers a fifteen year period, from 2016 until 2031<sup>1</sup>. More specifically, it set out:

- a vision of what the borough will look and feel like in 2031;
- a series of objectives and supporting actions on how the benefits of this growth can be shared across the borough;
- a range of policies to inform and positively shape future development and investment decisions, such as new homes, jobs and supporting infrastructure;
- a series of priorities and principles that will guide and inform the future development of the borough's individual places and key sites;
- a map showing the designations such as protected open space and the sites where new development will take place; and
- details on how we will implement and monitor these policies.

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<sup>1</sup> 2016 represents the base date of the Local Plan and coincides with the start of the preparation process.

5.2 The Tower Hamlets Local Plan has now reached an advanced stage in its preparation, following three rounds of consultation (as set out in table 1 overleaf). The policies of the Local Plan have been drawn up in the light of a comprehensive evidence base (relevant supporting documents are listed in appendix 4).

## **6 STAGES OF PLAN PREPARATION**

6.1 Development Plan Documents (Local Plans) must be prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. This requires the Local Plan to be (amongst other things):

- subject to rounds of consultation;
- submitted to the secretary of state to undergo an independent examination in public; and
- subject to a sustainability appraisal to test the impacts of the plan throughout its preparation. (In Tower Hamlets, this process has been integrated into a single appraisal tool, known as Integrated Impact Assessment, which also includes the Habitat Regulations Assessment and Equalities Impact Assessment.)

6.2 The preparation and adoption of new Local Plans must adhere with statutory regulations set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 of the legislation requires the proposed submission Local Plan and supporting documents to be made available for consultation. The purpose of this stage is to test the legal and technical soundness of the plan as a whole.

## **7 REGULATION 19 CONSULTATION**

7.1 Following Cabinet approval in September 2017, the consultation on the proposed submission version of the Local Plan (known as the regulation 19 stage) ran from Monday 2<sup>nd</sup> October until 5pm on Monday 13<sup>th</sup> November 2017. The consultation is focused on a series of tests set out in government guidance and the regulations, as described below. The proposed submission version is set out in appendix 1.

7.2 The proposed submission version of the Local Plan (together with associated supporting documents) was published on the council's website ([www.towerhamlets.gov.uk/localplan](http://www.towerhamlets.gov.uk/localplan)) and residents, businesses, developers, landowners and other stakeholders were able to make comments on the document online (via the council's consultation portal at <http://towerhamlets-consult.objective.co.uk/portal>) or via email and post. Hard copies of the Local Plan and the response form were also made available to view at idea stores and libraries throughout the borough. We also produced a short leaflet summarising the content of the Local Plan and how people and organisations should respond to the consultation.

7.3 Over 1200 organisations and individuals were notified about the regulation 19 consultation via letter or email from the council's database, giving details of how they could respond to the consultation and where and when consultation activities would be taking place. These included: statutory agencies, government bodies, developers, landowners, adjoining local authorities, community groups, voluntary organisations and local residents. The consultation was also advertised through

various means, including social media, meetings, workshops and the local press. The consultation was also featured on the front page of the council’s website, which informs all users of the website and provides a link to access the consultation.

7.4 Three public events were held during the period of consultation at the following locations.

Date	Time	Venue	Number of attendees
Wednesday 11 October 2017	6:30pm - 8:30pm	Idea Store Whitechapel, 321 Whitechapel Road, London, E1 1BU	5
Monday 16 October 2017	6:30pm - 8:30pm	Jack Dash House, 2 Lawn House Close, Isle of Dogs, E14 9YQ.	32
Thursday 19 October 2017	2pm - 4pm	Bethnal Green Library, Cambridge Heath Road, London, E2 0HL	11

7.5 These events outlined the role of the consultation and provided an opportunity to explain to the general public and other interested parties how they could respond to the consultation as well as the procedures which needed to be followed. All of these venues were chosen on the basis of their availability and accessibility, being centrally located in the heart of the borough close to public transport routes. The consultation arrangements went beyond the statutory requirements and complied with the standards set in the Statement of Community Involvement.

7.7 In total, 126 individuals or organisations (including residents, local authorities, government bodies, businesses, community groups, landowners and developers) responded to the regulation 19 consultation on the Local Plan. Between them they made 948 individual comments.

7.8 The overall approach to directing growth towards the opportunity areas (Isle of Dogs and South Poplar; City Fringe and Lower Lea Valley) and key transport interchanges within the borough has enjoyed broad consensus among consultees, and relatively few respondees have challenged the housing trajectory and the council’s five year land supply position.

7.9 Statutory bodies (including Greater London Authority, Environment Agency, Natural England, Heritage England, Highways Agency and Transport for London) are generally supportive of the Local Plan and have raised no objections on the grounds of soundness and legal compliance (apart from Sports England). All responses from neighbouring authorities have been positive and reflect the work that has been undertaken jointly on cross-boundary strategic priorities.

7.10 In general, developers and landowners argue that some of the policies are too prescriptive and should be made more flexible to take account of site constraints and market conditions (a reiteration of previous comments from regulation 18). The stepped down approach to tall buildings has been challenged but the tall building zones and other relevant designations (e.g. London wide landmarks) are supported in principle. Some developers and landowners are seeking to allocate new sites, extend existing designations (e.g. town centre boundaries) and proposed allocations or create new designations (e.g. Queen Mary University) in order to facilitate development and investment opportunities. Other respondees



are seeking further clarification on the meaning of some of the definitions and terms within the glossary and supporting text.

- 7.11 The development industry has raised no objections regarding our approach to mass waste collection systems although some landowners are objecting to the safeguarding of areas of search.
- 7.12 Responses have also been received from local councillors, resident groups and community organisations, the majority of which focused on the protection and enhancement of locally important heritage assets (including a petition from 3,912 signatures to retain gasholders in Bethnal Green) and estate regeneration.
- 7.13 None of these issues are, however, considered to be insurmountable from a soundness and legal perspective at this stage. The majority of these representations can be addressed through minor modifications (see below).
- 7.14 We consider that the Local Plan on the whole is sound and legally compliant. However, it is clear that some of the objections cannot be resolved at this stage and will need to be discussed and scrutinised through the public examination which is standard practice in the Local Plan process.
- 7.15 The process, analysis and responses to these key issues and all of the other representations are set out in the following documents.
- Statement of engagement. This includes a summary of the representations, issues raised and the council's response to them (appendix 2)
  - Schedule of minor amendments. This identifies minor modifications to the regulation 19 version of the Local Plan (appendix 3).
- 7.16 Additional evidence has been produced in the light of representations arising from the regulation 19 consultation and where it is anticipated there will be particular challenge and scrutiny on specific topics at the forthcoming examination in public. The evidence base (as listed in appendix 4) has been produced to ensure that the policies and proposals set out in the plan are robust, deliverable and based on objectively assessed needs, taking account of viability and other relevant considerations.

## **8 REGULATORY REQUIREMENTS FOR THE SUBMISSION STAGE AND HOW THEY HAVE BEEN ADDRESSED**

- 8.1 As explained above, the Local Plan must demonstrate soundness and legal compliance in line with the regulations. Soundness relates to the content of the plan and the strategy it proposes. Legal compliance relates to the process of how the plan has been prepared.

### **Legal compliance**

- 8.2 The legal and procedural tests which will be considered at the independent examination are as follows.
- Has consultation taken place in accordance with the Statement of Community Involvement?

- Have the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended been met?
- Has a proper Sustainability Appraisal and Habitat Regulations Assessment been carried out?
- Has the duty to co-operate been carried out (as per section 110 of the Localism Act)?
- Is the document identified in the Local Development Scheme and has the programme been met?

8.3 We consider that the Local Plan has been prepared in accordance with the requirements of the Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012. The table below sets out the engagement that has taken place upon what the plan should contain (regulation 18) and the draft proposed submission plan (regulation 19). Full details of the measures taken to consult on the Local Plan are set out in the Statement of Consultation.

8.4 The Local Plan has involved extensive engagement with the local community, residents, businesses, developers, statutory bodies, government agencies, the voluntary sector and partner agencies throughout its preparation, whose involvement has helped to positively shape and inform the content of the Local Plan, including the vision, objectives and policies.

Key stages	When	Stage	Purpose / nature of stage	Number of responses
Our Borough, Our Plan: A New Local Plan First Steps'	January - February 2016	Regulation 18	<ul style="list-style-type: none"> <li>• Review of new and emerging policy and legislation, market changes, political priorities etc.</li> <li>• Outline scope of the plan</li> <li>• Key challenges / opportunities</li> </ul>	130 representations were received which contained 1,235 individual comments.
Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing Benefits	November 2016 - January 2017	Regulation 18	<ul style="list-style-type: none"> <li>• Draft version of the Local Plan which included policies and site allocations.</li> <li>• Extensive engagement with internal and external stakeholders and members</li> <li>• Council's preferred approach based on evidence</li> <li>• Public drop-in events, area-specific workshops and bespoke meetings with specific groups (e.g. Tower Hamlets Housing Forum and the Youth Council)</li> <li>• Advertised in press and social media</li> </ul>	103 representations were received which contained 908 individual comments.
Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing Benefits	October – November 2017	Regulation 19	<ul style="list-style-type: none"> <li>• Formal comments were sought on the final draft Local Plan. Please note: this is the version that the council is proposing to submit to the secretary of state.</li> <li>• This consultation focussed on soundness and legal compliance</li> <li>• Public workshops</li> <li>• Advertised in press and social media</li> </ul>	126 representations were received which contained 948 separate comments

- 8.5 An Integrated Impact Assessment has been carried out at each stage of the plan's preparation in accordance with the legal requirements set out in the regulations. It brings together a number of different assessments (Sustainability Appraisal/Strategic Environment Assessment, Health Impact Assessment, Equalities Impact Assessment and Habitat Regulations Assessment) into a single framework to ensure the Local Plan meets the principles of sustainable development.
- 8.6 The duty to cooperate places a legal duty on local planning authorities to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation. We have prepared a statement demonstrating how we have effectively cooperated with neighbouring authorities and other public bodies on strategic cross-boundary planning matters (for example, in terms of the delivery of new housing and the provision of infrastructure and community facilities) to produce effective and robust policies within the Local Plan (as listed in appendix 4).
- 8.7 The Local Plan has also been prepared in accordance with the timetable set out in the latest Local Development Scheme.
- 8.8 The Mayor of London has confirmed that the proposed submission version of the Local Plan is in conformity with the existing adopted London Plan subject to a review within 10 years of adoption. The council's response to this is outlined in the statement of engagement (appendix 2).
- 8.9 The Mayor of London has also been out to consultation on a new draft London Plan, which will eventually replace the current version. The consultation began on Friday 1st December 2017 and ends on Friday 2nd March 2018, postdating the statutory public consultation on the Tower Hamlets Local Plan. We consider that the content of the Tower Hamlets Local Plan broadly aligns with those policies set out in the emerging London Plan. This is because we have been working collaboratively with the Greater London Authority throughout the process of preparing the Local Plan.

### **Soundness**

- 8.10 The starting point for the examination is the assumption that the council has submitted what it considers to be a 'sound' plan. To be sound, the Local Plan must be<sup>2</sup>:
- positively prepared – be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
  - justified – be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence;
  - effective – be deliverable over the plan period and based on effective joint working on cross boundary strategic priorities; and

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<sup>2</sup> The tests of soundness are set out in paragraph 182 of the National Planning Framework.

- consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

8.11 We consider that the Local Plan has been positively prepared, is effective, can be justified and is consistent with national planning policy set out in the National Planning Policy Framework.

8.12 In response to the representations from the regulation 19 consultation, a limited number of minor modifications have been proposed to the draft Local Plan and the Policies Map (as outlined in appendix 3). The regulations allow local authorities to make minor changes (known as ‘minor modifications’) to the Local Plan prior to submission, so long as they do not fundamentally alter the substance or strategic direction of the policies. These changes will not go to the soundness of the plan but are largely confined to typographical/grammatical amendments, factual updates, additional clarification or editorial changes that improve the plan as a whole.

8.13 The analysis of the representations and the discussion with statutory bodies and other relevant stakeholders indicates that the Local Plan does not require any main modifications at this stage<sup>3</sup>.

8.14 We consider that the Local Plan has been prepared in accordance with the regulations and complies with the tests of soundness and legal compliance and on this basis should proceed to submission.

## **9 NEXT STEPS**

9.1 Subject to Full Council approval, the Tower Hamlets Local Plan (along with the documents listed below) will be submitted to the secretary of state to undergo an independent examination in public in accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) 2012.

9.2 Regulation 22 of the planning regulations set out what has to be submitted to the secretary of state in both paper and electronic form. This includes:

- the full draft version of Local Plan (regulation 19 consultation document);
- the Policies Map;
- an assessment of the potential social, economic and environmental effects of the Local Plan (Sustainability Appraisal / Strategic Environment Assessment);
- the schedule of minor modifications;
- copies of all the representations made in response to the regulation 19 consultation;
- a consultation statement setting out who has been invited to make representations, how they were invited to make representations, a summary of the main issues they raised and how these have been taken into account;
- a statement setting how we complied with the duty to cooperate; and

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<sup>3</sup> ‘Main modifications’ are changes which, either alone or in combination with others, materially alter the plan or its policies. These will be based on discussions during the examination. Any main modifications will need to be subject to consultation and in some cases further sustainability appraisal (i.e. integrated impact assessment) might also be required.

- copies of all the relevant supporting documents that have informed the preparation of the Local Plan.
- 9.3 As soon as possible after submission, we will publicise the decision to submit the Local Plan to the secretary of state in the local press and on the council's web site and will contact everyone who has shown an interest in the Local Plan or requested to be notified that it has been submitted to the secretary of state.
- 9.4 We have appointed a programme officer to support the examination process. The programme officer will act independently on behalf of the planning inspector to organise and manage the administrative and procedural matters of the examination process, acting as the point of contact for any queries relating to timetabling or procedural matters.
- 9.5 In addition, statements of common ground are in the process of being prepared to demonstrate key areas of agreement between the council and interested parties with regard to the Local Plan and its supporting evidence base. This includes matters concerning the allocation of land and the provision of infrastructure. These will also highlight outstanding matters between parties which may require further discussion during the examination process.

### **Examination**

- 9.6 The examination process, in effect, will start at the point of submission. The secretary of state will appoint an independent planning inspector to undertake the examination to ensure the Local Plan meets the requirements set out in national policy and legislation, as set out in section 8 above.
- 9.6 At the examination, the planning inspector will carefully consider the draft Local Plan, the evidence which underpins it and the representations received at the regulation 19 consultation (October – November 2017). The role of the planning inspector is to decide whether it is sound and legally compliant. The planning inspector will conduct a series of public hearing sessions as part of the examination process.
- 9.7 The examination hearing sessions are scheduled to take place at the Town Hall at Mulberry Place in late spring / early summer 2018 following the council elections. Please note: those who are objecting to the plan may be asked to attend the hearings. Expert witnesses may also be called upon.
- 9.8 At the end of the examination, the planning inspector will publish a report into the soundness of the Local Plan. This will set out recommendations on how the Local Plan might need to be revised.
- 9.9 The planning inspector may recommend main modifications to the Local Plan (see paragraph 8.13 above) which are necessary in order to make it sound and legally compliant. We would need to request these changes in writing and then undertake a 6-week period of consultation during the examination period. The inspector will consider the representations received on these modifications when preparing his or her final report. However, there is no indication at this stage that the Local Plan will require any major modifications.

9.10 If the inspector identifies any fundamental issues with the plan during the examination, they may recommend to us that the plan should not be adopted. At this point, we will need to consider whether to withdraw the plan and prepare a new plan, which would mean going back to the regulation 19 stage again and re-submitting it to the secretary of state following the consultation. However, we remain confident that the Local Plan will be found sound and legally compliant at the examination.

### **Adoption**

9.11 If the Local Plan is deemed to be sound and legally compliant, the planning inspector will advise us to proceed through to adoption.

9.12 The Local Plan will also be finalised prior to adoption to include alterations to the wording of its policies and proposals and graphics in the light of the inspector's recommendations. The adopted version will also be desk-top published.

9.13 Following receipt of the inspector's report, we will seek to formally adopt the Local Plan in line with the inspector's recommendations. Full Council and the Mayor of Tower Hamlets will be asked to formally endorse the adoption of the Local Plan and remove the Core Strategy and Management Development Plan Document.

### **Status of the Local Plan**

9.14 The degree of weight that can be attached to the new Local Plan in the determination of planning applications will depend on the stage it has reached during its preparation. The Local Plan currently carries only limited weight because its policies and proposals have not yet been tested through the examination. Once adopted, the Local Plan will carry full weight in the determination of planning applications.

9.15 Once adopted, the Local Plan will form part of the borough's statutory development plan alongside the London Plan and any relevant neighbourhood plans.

9.16 Officers from the Plan Making team will continue to work closely with the Development Management team to assist the decision making process on the determination of planning applications as the Local Plan progresses through to adoption.

9.17 The indicative timetable for the next steps towards adoption in accordance with statutory requirements is set out below.

<b>Key tasks</b>	<b>Stage</b>	<b>Reporting</b>	<b>Timescale</b>
Submit the new Local Plan to the secretary of state	Submission (regulation 22)	Full Council	Early 2018
Examination in public	Regulation 24		Anticipated Spring 2018
Adopt the new Local Plan	Regulation 26	Full Council	Late 2018

## **10 COMMENTS OF THE CHIEF FINANCE OFFICER**

- 10.1 This report seeks approval to submit the proposed Tower Hamlets Local Plan 2031 along with the representations received to the secretary of state.
- 10.2 Whilst there are no specific financial consequences arising directly from the recommendations in the report, ultimately the Local Plan will underpin key decisions in relation to the allocation of the limited resources available within the borough, and will influence the shaping of the council's Medium Term Financial Strategy and Capital Strategy. In particular, it will provide the basis for estimating the need for and cost of providing council services based on changes to the borough's population together with the additional revenue generated from locally generated funding sources – council tax and increasingly business rates.
- 10.3 The various studies and evidence required to support the plan set out some of the challenges that the authority and its partners may face over coming years as a result of demographic and economic growth. Individual infrastructure developments will need to be subject to detailed planning at the appropriate time, including consideration of the financial impact on both partner organisations and on the council. The Local Plan and supporting data will also provide evidence to determine the charging schedules in relation to section 106 obligations and the Community Infrastructure Levy, and to inform decisions concerning the appropriate use of the resources secured.
- 10.4 The main costs associated with the development of the Local Plan are staffing-related and are financed from within existing resources. The examination process will lead to expenditure on items such as the hiring of consultants, printing/advertising and the fees associated with the appointment of a planning inspector to hold the public examination, for which there is existing budgetary provision.

## **11 LEGAL COMMENTS**

- 11.1 This report seeks the approval from Full Council to submit the proposed *Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits* to the secretary of state to undergo an independent examination, along with supporting documents.
- 11.2 It is a statutory requirement for a local planning authority to identify the strategic priorities for the development and use of land in the authority's area, and the policies to address these priorities must be set out in the development plan documents, except where policies to address those priorities are set out in the spatial development strategy (the London Plan).
- 11.3 The development plan (see paragraph 9.15 above) represents the starting point for assessing and determining planning applications. Planning applications must be determination must be made in accordance with the development plan unless material considerations indicate otherwise (as per section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 11.4 The requirements relating to the preparation/consultation, examination and adoption of a development plan document are laid out in the Planning and

Compulsory Purchase Act 2004, The Town and Country Planning (Local Planning) (England) Regulations 2012 (the 2012 Regulations) and the National Planning Policy Framework.

- 11.5 Pursuant to section 19 of the Planning and Compulsory Purchase Act 2004, as part of the borough's development plan, the Local Plan must:
- a. be prepared in accordance with the council's Local Development Scheme; and
  - b. taken as a whole include policies designed to secure that the development and use of land in the council's area contribute to the mitigation of, and adaptation to, climate change.
- 11.6 The Local Plan must also be in general conformity with the Spatial Development Strategy for London (known as the London Plan).
- 11.7 Section 19 of the Planning and Compulsory Purchase Act 2004 and regulations 8, 9 and 10 of the 2012 regulations set out the requirements for Local Plans, and matters to which the local planning authority must have regard in preparing the plan. In preparing the Local Plan, the council are required to (amongst other things):
- have regard to, *inter alia*, national policies and advice contained in guidance from the secretary of state and the London Plan;
  - comply with the council's Statement of Community Involvement;
  - carry out an appraisal of the sustainability of the proposals in the document and prepare a report of the findings of the appraisal; and
  - comply with the duty to co-operate with other local planning authorities and prescribed bodies and persons in respect of strategic matters.
- 11.8 Officers are seeking approval from Full Council to submit the Local Plan to the secretary of state. This is because the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 provide that the process of preparation of a development plan document is an executive responsibility but the formal process of submission to the secretary of state and its adoption is the responsibility of Full Council (regulation 4).

### **Equalities**

- 11.9 In carrying out the function of preparing a Local Plan, regard must be given to the duty to eliminate unlawful conduct under the Equality Act 2010. The duty (as set out at section 149 of the 2010 act) requires the council, when exercising its functions, to have 'due regard' to the need to eliminate discrimination (both direct and indirect discrimination), harassment and victimization and other conduct prohibited under the act, and to advance equality of opportunity and foster good relations between those who share a 'protected characteristic' and those who do not share that protected characteristic. The protected characteristics and groups are: age, disability, gender reassignment, pregnancy and maternity, race, gender, religion or belief, sexual orientation and marriage/ civil partnership status.
- 11.10 In respect of the Local Plan, an equalities impact assessment has been carried out as part of the Integrated Impact Assessment which concludes that the Local



Plan will generally have positive outcomes on the wellbeing and the quality of life of protected groups, particularly those who face discrimination, disadvantage and prejudice, with no significant adverse impacts identified. The Integrated Impact Assessment will also ensure that the council complies with its duties under the Conservation of Habitats and Species Regulations 2010 and the Environmental Assessment of Plans and Programmes Regulations 2004.

- 11.11 Equalities has been embedded into the policies of the Local Plan so that it is at the heart of the decision making process on the determination of planning applications. Part 3 of the Local Plan sets out a strategy for delivering sustainable growth across the borough, with a particular emphasis on ensuring that the built environment is accessible (especially to those with physical impairments) and promotes community safety and cohesion. This will help to ensure the continued delivery of 'One Tower Hamlets' - a place where people from all backgrounds are able to have their voice heard and share equal life chances.

## **12 ONE TOWER HAMLETS CONSIDERATIONS**

- 12.1 For the Local Plan, a screening opinion on the need to undertake a full Equalities Impact Assessment has been carried out as part of the Integrated Impact Assessment. This confirmed that a full Equalities Impact Assessment is not necessary because due regard is given to the council's Public Sector Equality Duty within the emerging Local Plan. Policies on safeguarding and provision of accommodation for gypsies and travellers and the provision of adaptable and accessible accommodation will bring positive outcomes for different groups, including the disabled. For the regulation 19 consultation, a wide range of groups and organisations from the voluntary and community sector were contacted (including those identified in the council's Single Equality Framework) to invite them to participate in the preparation of the Local Plan process. Among them included representatives from the youth council, faith groups, local business forums, black and ethnic minority groups, health organisations and the network of organisations representing disabled people. Officers will continue to work with the council's equalities team to ensure actions are undertaken to mitigate any impacts on the equality profile of those affected by the Local Plan.

## **13 BEST VALUE (BV) IMPLICATIONS**

- 13.1 The new Local Plan will enable the council to continue to ensure that the delivery of housing, infrastructure and other new development is optimised, and that social, economic and environmental benefits continue to be secured and shared across the borough and beyond. The development of sites following the policies and guidance contained within the new Local Plan will generate section 106 and Community Infrastructure Levy (CIL) contributions, where relevant. This may include the delivery of new affordable housing, local enterprise and employment opportunities, public realm enhancements and transport infrastructure.

## **14 SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT**

- 14.1 Sustainability appraisal is a legal requirement for the preparation and development of a Local Plan. Under the Planning and Compulsory Purchase Act 2004, sustainability appraisals must comply with the requirements of a Strategic Environmental Assessment (SEA). The SEA ensures environmental issues are

incorporated into the Local Plan and assessed in decision-making throughout the entire plan-making process. The sustainability appraisal will be submitted to the secretary of state alongside the new Local Plan as part of the Integrated Impact Assessment.

14.2 The Local Plan will help ensure a greener environment in a number of ways, including:

- protecting and enhancing areas of open space and water space;
- promoting biodiversity;
- managing the impacts of construction on communities;
- reducing and minimising waste within developments;
- promoting sustainable transport options, such as new pedestrian and cycle routes; and
- ensuring new buildings and spaces meet the highest standards of environmental sustainability and design.

## **15 RISK MANAGEMENT IMPLICATIONS**

15.1 Throughout its preparation, the emerging Local Plan has been regularly reported and presented to a number of internal groups that consider risk management issues and mitigation measures. These have included:

- Local Plan: Internal Stakeholders Group;
- Development and Renewal Directorate Management Team; and
- Corporate Management Team.

15.2 The Corporate Leadership Team approved a Project Initiation Document (PID) in May 2015. Officers have worked collaboratively across the relevant services on developing the new Local Plan and its evidence base through CLT and a Local Plan Internal Stakeholder Group. The Mayor of Tower Hamlets and Lead Member for Strategic Development and Waste have been briefed frequently on the new Local Plan, providing significant input into the development of the Local Plan.

## **16 CRIME AND DISORDER REDUCTION IMPLICATIONS**

16.1 The Local Plan contains policies that seeks to ensure the design of developments minimises opportunities for crime and disorder and creates a safer and more secure environment. In particular, development will be required to incorporate the principles of 'secured by design' to improve safety and perception of safety for pedestrians and other users, without compromising the ability to create aesthetic and functional public spaces, such as crowded places.

## **17 SAFEGUARDING IMPLICATIONS**

17.1 The Local Plan is not considered to give rise to any safeguarding implications.

## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- NONE

### **Appendices**

Appendix 1: Proposed submission version of the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (please note: Cabinet members were all given copies of the printed version of the document so it has not been replicated in the MAB pack).

Appendix 2: Summary of representations

Appendix 3: Schedule of minor amendments

Appendix 4: Local Plan documents to be submitted to the secretary of state for examination

Appendix 5: Local Plan risk register

### **Officer contact details for documents:**

- N/A

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# Managing growth and sharing the benefits

Regulation 19 consultation October 2017

# Tower Hamlets Local Plan 2031





**Version Control**

**LONDON BOROUGH OF TOWER HAMLETS**

**TOWER HAMLETS DRAFT LOCAL PLAN 2031**

**Managing Growth and Sharing the Benefits**

**Consultation version**

This is a regulation 19 consultation document prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulation 2012 and the National Planning Policy Framework



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## CONSULTATION INFORMATION

### Overview

This six-week consultation is the last chance to comment on the plan before it undergoes a public examination.

We want to make sure it is developed in consultation with residents and stakeholders. This round of consultation builds on the consultation which took place between November 2016 and January 2017 and the findings from our evidence base.<sup>(1)</sup>

Supporting documents with background information can be found at [www.towerhamlets.gov.uk/localplan](http://www.towerhamlets.gov.uk/localplan).

This document should be read in conjunction with the government’s National Planning Policy Framework.

### When and how to respond

Comments must be given in writing no later than **5pm on Monday 13<sup>th</sup> November 2017**, preferably on-line at: <http://towerhamlets-consult.objective.co.uk/portal>.

Unfortunately, we are unable to accept late responses.

If you are unable to make comments on-line, please fill in a response form and send it via email ([localplan@towerhamlets.gov.uk](mailto:localplan@towerhamlets.gov.uk)) or post (FREEPOST, Planning Policy Consultation, Strategic Planning, London Borough of Tower Hamlets, PO BOX 55739, London, E14 1BY).

This consultation will give you the opportunity to comment on how the plan has been prepared and its content. All comments should explain whether you think the plan is sound and legally compliant. To be sound, the plan must be:

- positively prepared (e.g. helps meet the targets of the London Plan);
- justified (i.e. the policies in the plan are founded on a robust evidence base);

- effective (i.e. the policies of the plan can be delivered and have been formulated on the basis of joint working with partners); and
- consistent with national policy (i.e. the plan has been prepared in line with the requirements set out in the National Planning Policy Framework).

**Please note: your comments and your name or the organisation you represent will be published on our website.** However, we will not publish personal information, such as telephone numbers or email addresses.

We will be holding workshops during this consultation to explain how you can engage in this process. For further information and details of the workshop and how you can take part in this consultation, please visit our website at [www.towerhamlets.gov.uk/localplan](http://www.towerhamlets.gov.uk/localplan), or call us on 0207 364 5009.

Paper copies of the plan (and the response form) can be seen at the Town Hall (Mulberry Place, Clove Crescent, E14 2BG), libraries and idea stores (as listed at [www.towerhamlets.gov.uk/localplan](http://www.towerhamlets.gov.uk/localplan)).

1 Where 'we' is used in this document, this refers to Tower Hamlets London Borough Council.

# 6 PREFACE

## Next stages

Your comments will be sent with this version of the Local Plan to the government. The government will appoint an independent planning inspector to examine the plan to ensure it meets with government policy and other legal and procedural criteria. The planning inspector will conduct a series of hearing sessions as part of this process (taking into account the comments we have received on this plan) and publish a report afterwards. This will set out recommendations on how the plan might need to be revised. At this point, we will consider the recommendations of the planning inspector and decide on the best way forward.

If you would like to take part in the examination hearing sessions, please let us know (either on-line or on the response form). For further details on these stages and the timetable leading to adoption, please refer to the Local Development Scheme (see [www.towerhamlets.gov.uk/localplan](http://www.towerhamlets.gov.uk/localplan)).

The Local Plan has been published in line with the requirements set out under regulation 19 of the Town and County Planning Act (Local Plan) (England) Regulations (2012). Once adopted, it will replace the Core Strategy (2010) and Managing Development Document (2013).

## MAYOR’S FOREWORD

This Local Plan sets out how we will manage growth in Tower Hamlets and ensure we share the benefits with all our residents over the next 15 years.

We have seen the population in the borough double in the past thirty years and it is predicted to rise by almost 100,000 by 2031. This growth shows that Tower Hamlets is a place people want to live and work in, which we should celebrate, however we need to plan appropriately for this scale of growth.

The recent resident survey showed that only 35% of residents felt new housing being built was affordable. This is an issue across the capital but clearly one we have to address in Tower Hamlets. The Local Plan sets out policies on providing the affordable homes we need.

The Local Plan also sets out policies about infrastructure provision, employment opportunities and protection of our environment, including air quality. Along with the policies, developments will need to fit within the ambitious vision of the Local Plan - to help continue to build for the kind of borough we want to enjoy in the future.

Planning impacts on our everyday lives and influences the character of environment – our borough. It is because of this that we need the guidance to help plan for our future and shape the places we live.

Having listened to our local community, here is a Local Plan that reflects their needs and priorities and will help take Tower Hamlets in the right direction.

**John Biggs, Mayor of Tower Hamlets**



# 8 PART 1: SETTING THE SCENE

## Chapter 1: Introduction

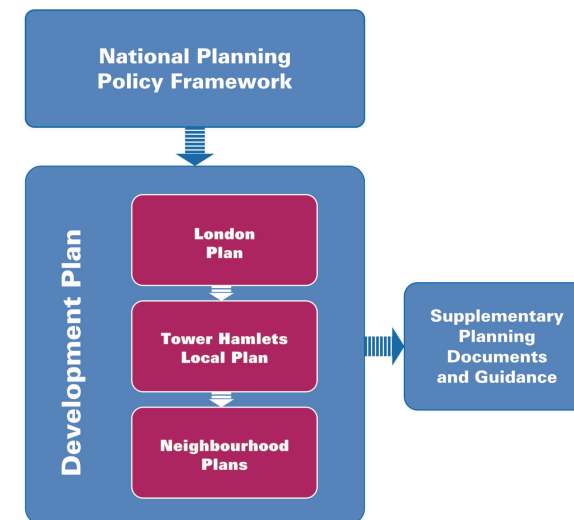
- 1.1** The Local Plan sets out how the borough of Tower Hamlets will grow and develop from now on until 2031. It identifies how many new homes, jobs and services are needed to support our growing population, and where and how they should be provided. It will also shape how our places will look and feel and influence the way that our communities interact with each other and the spaces around them. It also provides a series of policies to ensure development is well-designed, accessible, safe and respects and enhances the environment, and can be delivered alongside new infrastructure and local services.
- 1.2** Tower Hamlets is one of the fastest growing areas in Europe. In order to keep pace with this change, this plan has been developed to ensure the benefits of this growth can be spread across the entire borough and also coordinate and manage it in a way that can best meet the needs of our communities.

### Context

- 1.3** The Local Plan has also been prepared in line with the London Plan, relevant acts and regulations and the policies set out in the government's National Planning Policy Framework, with input from local residents, businesses, landowners, neighbouring boroughs, statutory bodies and other interested stakeholders. In particular, it positively responds to the minimum targets for housing and jobs set out in the London Plan<sup>(2)</sup>.
- 1.4** The Local Plan will also sit alongside any future neighbourhood plans, which provide more detailed planning guidance to help shape the development of specific neighbourhoods.
- 1.5** Together, these documents (along with the London Plan) make up the borough's development plan and will be used to make decisions on planning applications (see figure 1).

- 1.6** This plan must be read as a whole. Proposals will be considered against all relevant policies set out in this plan.
- 1.7** The policies and proposals set out in this document are also illustrated on an interactive map (known as the Policies Map). This map identifies areas of change and opportunity within the borough, as well as the open spaces and other important local assets that will be protected and, where possible, enhanced. It also shows the areas identified in the policies where specific guidance will be followed.

Figure 1 :Relationship between the Tower Hamlets Local Plan and other relevant documents.



### How the Local Plan fits together

- 1.8** This document comprises the following elements.

2 The London Plan sets out the overall approach to planning and growth across London, produced by the Greater London Authority on behalf of the Mayor of London. The London Borough of Tower Hamlets Local Plan will be in general conformity with the London Plan. Where relevant, cross-references are made to London Plan policies and these will be applied alongside the policies in the Local Plan.

### Section 1: Setting the scene

This section outlines the borough's characteristics and the key issues, challenges and opportunities it faces, both now and in the future.

### Section 2: Vision & objectives

This section sets out the long term vision of how Tower Hamlets will embrace its role as the engine of London's growth and make best use of its assets (including its links to the City of London and the waterways), while seeking to manage and shape how its places will change and share the benefits of this growth. This vision is linked to a series of overarching objectives and principles.

### Section 3: Policies

This section sets out the policies that we will use to guide and manage development and the use of land across the borough, covering a number of themes, including housing, the economy and jobs, town centres, community facilities, transport and open spaces. Our policies are divided into two types.

1. Spatial policies. These set out overarching principles that explain how the vision and objectives of the plan will be achieved (as shown in purple and numbered with the prefix 'SP' under each topic).
2. Development management policies. These set out detailed criteria that we will use to determine planning applications (as shown in blue and numbered with the prefix 'DM' under each topic).

### Section 4: Delivering sustainable places

This section outlines the priorities and principles that will shape the future development of different parts of the borough and identifies a range of sites where significant housing and employment-related uses alongside key infrastructure will be delivered.

### Section 5: Delivery & implementation

This sets out how this plan will be delivered and monitored.

### Section 6: Appendices

This section contains a glossary of terms and abbreviations, a summary of the borough's future housing supply, a series of standards on how certain policies will be implemented, and explains how the policies set out in the Core Strategy and managing Development Document will be addressed within the document.



## Chapter 2: Borough Portrait

### Introduction

- 2.1** Tower Hamlets has played a significant role in the social, political and economic history of London. Over the centuries, the borough has been a focal point for London and the UK, acting as a key trading route to the east from Central London. Today, Tower Hamlets has grown into a world-class hub for financial, technological and creative industries, with the potential to become the setting for exciting innovations and advances in the twenty-first century.
- 2.2** However, this growth has brought with it stresses: Tower Hamlets, for example, still has high levels of deprivation and its ever-growing population is placing increasing pressure on local services and resources, including the use of land. Providing enough new homes, jobs and services in the right places to support the needs of our growing population and other parts of London is one of our key challenges.
- 2.3** This chapter provides an overview of Tower Hamlets and how it relates to the wider London and UK context. It also looks at the future predictions for growth and the implications this will have on local communities and the look and feel of the borough.

### Location

- 2.4** Tower Hamlets is an inner London borough and occupies an important strategic location within London and the south east of England (see figure 2). The borough shares its boundaries with the City of London in the west and the London boroughs of Newham and Hackney in the north. The River Thames flows along the southern boundary of the borough, separating it from the Royal Borough of Greenwich and the London boroughs of Lewisham and Southwark, while the River Lea runs along the eastern fringe of the borough.

- 2.5** Part of the borough falls within the boundary of the London Legacy Development Corporation (LLDC) - the local planning authority which is coordinating the growth and regeneration of the Queen Elizabeth Olympic Park and the wider area as part of the legacy of the Olympic Games (as defined on figure 3). Any planning application relating to land within this area (including Hackney Wick and Fish Island) must be submitted to the London Legacy Development Corporation.
- 2.6** As shown in figure 2, the borough is extremely well-connected with excellent transport links via tube, rail and bus to the City of London, Stratford, Greenwich and other parts of London and beyond, including international airports (e.g. London City Airport and Stansted) and the Channel Tunnel. The borough also forms part of a major growth corridor between London, Stansted and Cambridge, centred on enterprise and innovation within emerging sectors, such as digital media, life science, telecommunications and advanced manufacturing.

### Population

- 2.7** Tower Hamlets has doubled its population in the past 30 years, from 150,200 in 1986 to 304,900 in 2016<sup>(3)</sup>. From 2006 to 2016, Tower Hamlets witnessed the fastest population growth of any local authority in England and Wales, particularly among the working-age population, making it one of the densely populated boroughs in the UK.
- 2.8** One of the borough's defining characteristics is the diversity of its people. Around two thirds of the borough's population come from a minority ethnic background and more than two fifths of the population were born outside of the UK<sup>(4)</sup>. The borough also has the largest proportion of young people compared to other inner London boroughs.
- 2.9** The borough's daytime population has also increased significantly in recent years, primarily as a result of workers travelling to and from the City Fringe and Canary Wharf employment areas, and is approximately 42% larger than its residential population<sup>(5)</sup>.

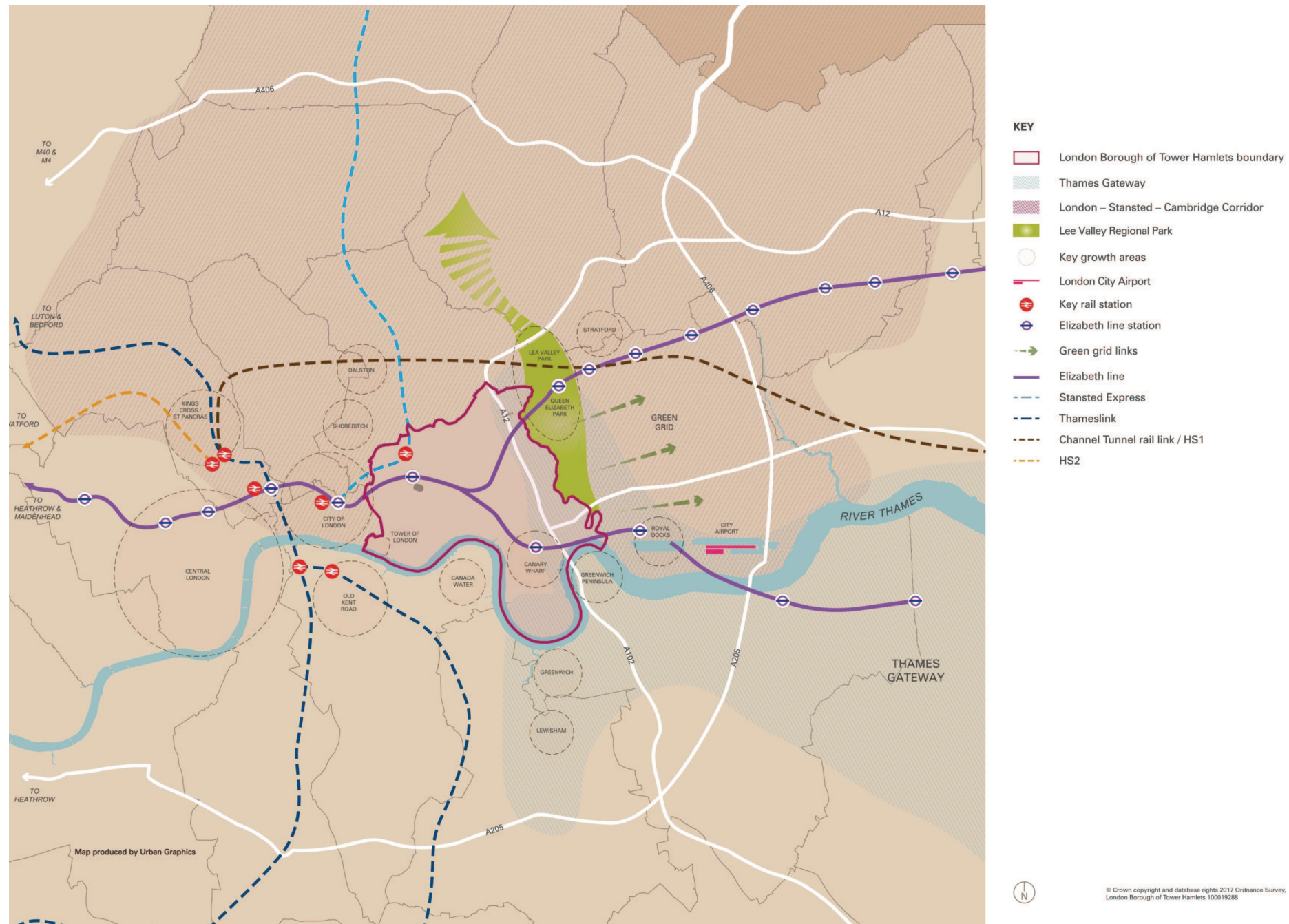
3 [www.towerhamlets.gov.uk/documents/borough\\_statistics/population/MYE\\_2015](http://www.towerhamlets.gov.uk/documents/borough_statistics/population/MYE_2015)

4 [www.towerhamlets.gov.uk/boroughstatistics/wardprofiles/census](http://www.towerhamlets.gov.uk/boroughstatistics/wardprofiles/census)

5 <https://data.london.gov.uk/dataset/daytime-population-borough>



Figure 2 : Position of Tower Hamlets within the context of London and neighbouring areas





# 12 PART 1: SETTING THE SCENE

Figure 3 : London Borough of Tower Hamlets



## Economy & employment

- 2.10** Tower Hamlets has also seen significant economic growth: the total number of jobs in the borough has nearly doubled since the millennium (compared to an increase of around 25% across London as a whole).
- 2.11** Tower Hamlets continues to play a major role in supporting both the London and national economy, contributing significantly to the growth of London as a financial and business centre.
- 2.12** The majority of employment is concentrated within the City Fringe/Whitechapel and Canary Wharf/Isle of Dogs areas of the borough - these are strategically important employment locations of national and international importance and serve as the headquarters for a large number of multinational businesses. Tower Hamlets also has a very high number of small-to-medium enterprises and micro-businesses, which is characteristic of its role as a seedbed for innovation, creativity and entrepreneurship. However, the benefits of this growth have not been evenly spread across the borough: only 15% of jobs in the borough go to local residents<sup>(6)</sup>.
- 2.13** While there are fewer people who are economically active than the regional and national average, levels of education attainment have improved significantly in recent years.

## Housing

- 2.14** In recent years, Tower Hamlets has delivered more homes than any other authority in England. However, like many London boroughs, Tower Hamlets suffers from an acute shortage of affordable homes and relative high levels of overcrowding.

- 2.15** Over the past decade there has been a marked change in housing tenure. Private rented housing is now the fastest growing and largest tenure in the borough. The percentage of social housing has fallen significantly and levels of owner occupation, the smallest tenure, have also slightly fallen: these trends are set to continue.

## Deprivation & inequality

- 2.16** Tower Hamlets is a place of extremes and contrasts. While relative poverty in Tower Hamlets has declined, deprivation remains widespread, particularly in central and eastern parts. The borough also has the highest levels of child and pensioner poverty in England<sup>(7)</sup>. However, there are pockets of affluence within close proximity to the River Thames and former dockland areas. This disparity is reflected in the borough's ratio of low-to-high pay, which is the largest in London<sup>(8)</sup>.
- 2.17** The health of people in Tower Hamlets is significantly worse than the London and England averages, with healthy life expectancy at birth being nearly 10 years less than the national average<sup>(9)</sup>. Health inequalities also persist in the borough, with significant differences in life expectancy between the most and least deprived wards. Physical activity is a major contributor to health and well-being, and levels of physical activity in Tower Hamlets are currently lower than both the London and England averages, with those living in the more deprived areas in the east of the borough being less likely to take part in active sport. Levels of childhood obesity are significantly higher in the borough than the London and England averages, with levels of obesity among 10-and-11-year-olds now increasing. Levels of social isolation and loneliness are also relatively high compared to the England average but similar to London.

6 [www.towerhamlets.gov.uk/boroughstatistics/economyandbusinesses](http://www.towerhamlets.gov.uk/boroughstatistics/economyandbusinesses)  
 7 [www.towerhamlets.gov.uk/boroughstatistics/incomepovertyandwelfare/indicesofdeprivation](http://www.towerhamlets.gov.uk/boroughstatistics/incomepovertyandwelfare/indicesofdeprivation)  
 8 London Poverty Profile (New Policy Institute, 2015)  
 9 [www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthlifeexpectanciesatbirth](http://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthlifeexpectanciesatbirth)

# 14 PART 1: SETTING THE SCENE

## Environment

- 2.18** Figure 4 below illustrates that Tower Hamlets is made up of distinct places (24 in total) with unique characteristics, from the major international business centres of Canary Wharf and parts of the City Fringe, through to residential areas with traditional east end character, such as Bow and Stepney, and vibrant inner city communities, such as Whitechapel and Shoreditch. Alongside these areas are a number of major leisure attractions and landmarks, such as museums, galleries, markets (e.g. Spitalfields Market), parks (e.g. Victoria Park) and traditional shopping streets (e.g. Roman Road)<sup>(10)</sup>.
- 2.19** These places have evolved from a series of ancient hamlets into densely-populated inner-city communities within the heart of east London, encompassing conservation areas, town centres and assets of significant historic and community value, interspersed with open spaces, waterways, streetscapes and views.
- 2.20** Steeped in a rich and varied history, Tower Hamlets is blessed with substantial areas of historic and architectural interest, including 58 conservation areas (which cover around 30% of its total area) and over 2000 listed buildings, with great variation in character and size. Some of these buildings are landmarks of international importance, including the Tower of London (a UNESCO world heritage site) and 1 Canada Square in Canary Wharf. Other notable historic buildings include the medieval parish church of St Dunstan (which predates the Tower of London) and the high-tech, former Financial Times Print Works (constructed in the late 1980s).

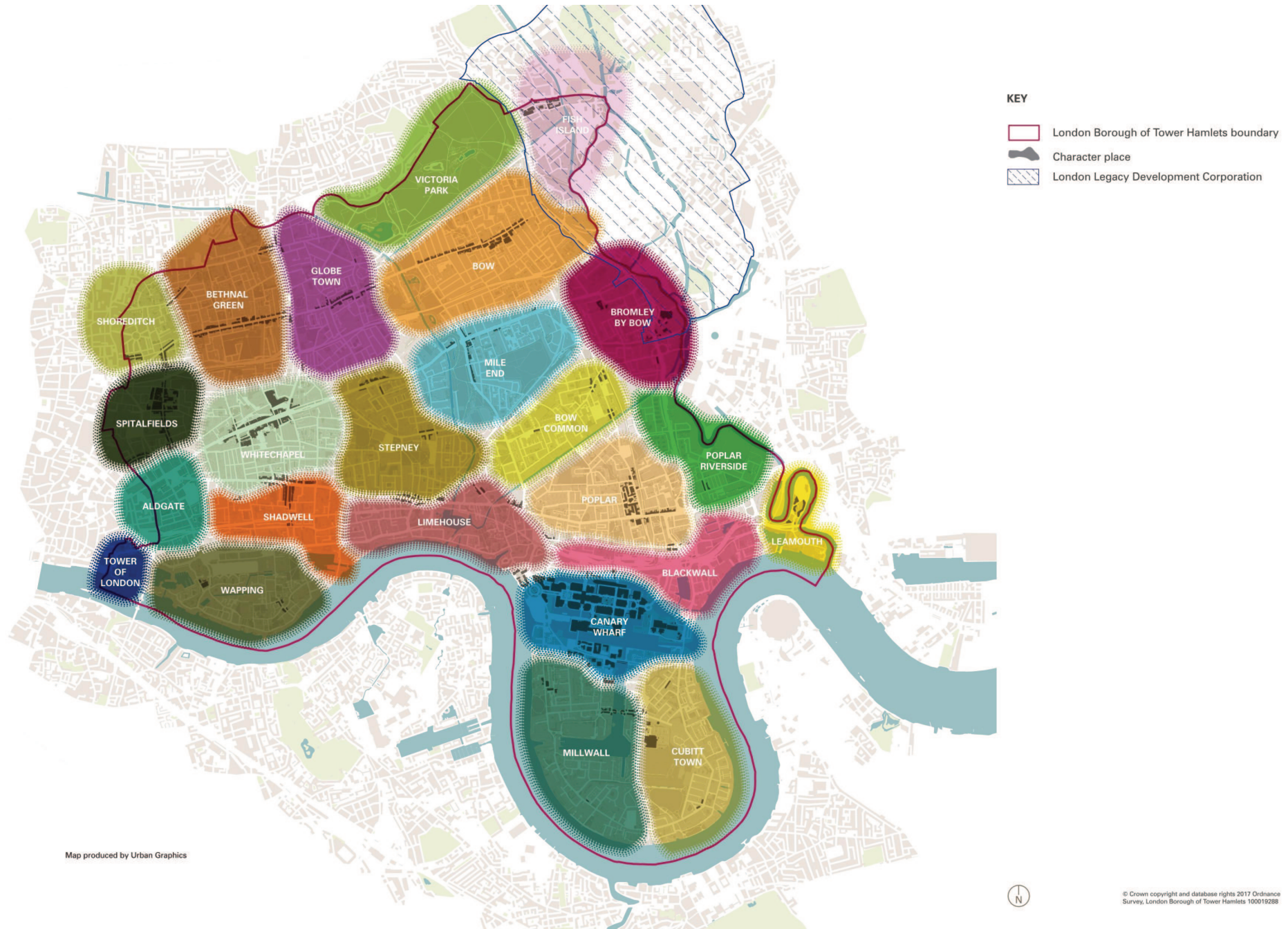
- 2.21** Large parts of the borough (including the former dockland areas and part of the City Fringe) have undergone significant change and regeneration, including the refurbishment and restoration of historic buildings along the Thames and within our inner city communities. In recent years there has been an increase in the number of tall buildings, causing notable changes to the borough's skyline.
- 2.22** The greatest natural asset in the borough is the River Thames and the network of inland waterways which dissect the borough, such as canals, reservoirs and former working docks (see figure 5).
- 2.23** The borough also has a range of high quality parks and open spaces ranging from large urban parks (e.g. Victoria Park, Mudchute Park and Mile End Park) through to burial grounds and small pocket parks. However, the overall provision of publicly accessible open space in the borough is low compared to other inner London boroughs with similar characteristics, as well as being far below national standards. The topography and urban form of the borough also makes it vulnerable to the effects of climate change, in particular from flooding and the urban heat island effect.
- 2.24** While carbon emissions are steadily falling, the borough still emits relatively high levels of carbon dioxide relative to other parts of London, primarily due to emissions from industrial and commercial uses<sup>(11)</sup>. In addition, parts of the borough, particularly around major roads and junctions, have some of the poorest air quality levels in London.

10 The Tower Hamlets Urban Structure and Characteristic Study identifies the spatial structure of the borough, comprising 24 individual places.

11 UK Local Authority and Regional Carbon Dioxide Emissions: 2005- 2014 (National Statistics, 2016)



Figure 4 :24 places of Tower Hamlets



# 16 PART 1: SETTING THE SCENE

## Chapter 3: Trends

**3.1** The following provides a summary of the emerging trends, which will give rise to both opportunities and challenges for the borough over the plan period.

### Our infrastructure

By 2031, the borough's population is expected to increase to nearly 400,000 inhabitants. The greatest increases are expected to be amongst the older working age population. The borough is also expected to become more ethnically diverse in line with national and regional trends.

Population growth will demand more homes and jobs and will significantly impact on existing social and physical infrastructure, including schools, healthcare, open spaces and leisure facilities as well as less visible but very important infrastructure, such as utilities and telecommunications. New delivery models and locations will be required.

Many public sector organisations are seeking to merge services and reduce the number of buildings they operate from. Budgetary constraints and emerging delivery models mean the public sector is gradually reducing its assets and land ownership. This will change the way in which infrastructure and services are planned and delivered in the future.

In order to meet the growth needs of the population, specific requirements include:

- new primary schools;
- new secondary schools;
- a number of new primary health care facilities;
- 2-4 additional local presence facilities (or equivalent expansions to existing idea stores); and
- a number of new publicly accessible open spaces and sport halls.

Multiple projects are underway or planned to improve the public transport network across the borough, including the new Elizabeth line, improvements to the London Underground (e.g. Central and Jubilee lines) and Docklands Light Railway, improved river services and additional river crossings.

Even with these capacity increases, future demand is forecast to outstrip supply over the plan period. Consequently, a significant step change in future capacity is required. Tower Hamlets is expected to experience continued job gains and strong employment growth over the period to 2031 (in excess of London and national averages).

### Our local economy

The changing global economy, emerging employment sectors and working trends, including the rise of remote working and self-employment, will have an impact on the type of employment spaces and facilities required in the borough.

The economic impact of the recent European Union referendum result is still to emerge, but it may have an impact on the role of London as a financial service hub for Europe.

In Tower Hamlets, economic growth will be concentrated in the following areas.

- City Fringe (including Tech City) which is emerging as one of London's most significant areas for economic growth. Creative, digital and technology-based industries are particularly clustered around Shoreditch, Whitechapel and Cambridge Heath, which is becoming one of the largest technology start-up clusters in the world.
- Whitechapel, where a new medical research cluster associated with the Queen Mary University is emerging (known as Med City).
- Canary Wharf, where continued growth will place greater demand on employment floorspace in surrounding areas (e.g. South Quay), including small-to-medium-sized business accommodation.
- Bow and Poplar Riverside, where the Olympic Games has provided a catalyst for new investment, which is also driving growth in neighbouring areas such as Canning Town and Stratford.

As the nature of the borough has moved from industrial to residential, industrial land has come under increasing redevelopment pressure from other uses. However, there is strong demand for industrial land in inner London and it requires safeguarding to contribute to the borough's and London's economic growth. Ensuring adequate space is available to meet the needs of small-to-medium businesses remains a challenge.

# 18 PART 1: SETTING THE SCENE

## Our homes

Tower Hamlets continues to be a place where people want to live but there is a limited supply of homes and prices are very high compared to average incomes. The cost of housing is increasing and the borough is likely to become more polarised between those on higher and lower incomes, since those on middle incomes are less able to afford private housing, further increasing inequalities in our local communities.

The current high values of residential development mean that other land uses, including employment space, community facilities and open space, will become even more difficult to secure/deliver and come under increasing pressure for conversion to housing.

Tower Hamlets has the highest target for new homes in London. Consequently, the borough must build more homes than it requires to meet wider London need. This will enable us to deliver the affordable homes we need at a faster rate.

The Poplar Riverside Housing Zone and the remediation of former industrial sites within the Lea Valley is opening up development opportunities on the eastern boundary of the borough, an area which is currently poorly connected.

Population and retail trends (including growing on-line shopping and smaller chain convenience stores) are changing the use and role of our town centres. Town centres are also valuable economic activity and employment areas: a balance of uses is vital to attracting investment, increasing visits and maintaining vitality and vibrancy during the day and night.

## Our environment

With less land available, more development will come forward on smaller and/or constrained sites, and there will be increasing pressure to regenerate and intensify developments.

The borough already has the third highest carbon emission levels in London and suffers from poor air quality as a result of congestion. Increasing development could worsen both, unless mitigating action is taken.

Long distance transport routes criss-cross the borough, largely from east-to-west, in the form of rivers, canals, railway lines and major roads. These in turn create physical barriers which restrict movement between Tower Hamlets and adjoining local authorities, such as Greenwich and Newham, and between northern and southern parts of the borough. Improvements are essential to better connect our places and integrate them with neighbouring boroughs.

In some areas, the public realm is disconnected and poorly designed, which contributes to a poor visual appearance in the streetscape.

As the borough becomes more densely populated, levels of open space deficiency are expected to increase. Improving existing open spaces and maximising opportunities to enhance the green grid and deliver small green interventions, such as pocket parks, as well as strategic open space will become increasingly important, especially within deficient areas.



## Chapter 1: Our vision for Tower Hamlets

**1.1** The following vision sets out how the borough of Tower Hamlets and its places will look and feel like in the year 2031.

As the centre of London expands east, Tower Hamlets will embrace its role as a key focus for London's growth, making best use of the economic benefits from Canary Wharf, the City of London and Stratford. The connections between the borough and surrounding areas will be improved, whilst maintaining our distinct east-end identity.

This growth will be primarily delivered in the City Fringe, the Lower Lea Valley and Isle of Dogs and South Poplar and at key locations along transport corridors. The benefits of the transformation of our borough will be shared throughout Tower Hamlets, including all our residents, ensuring no one is left behind.

Tower Hamlets will continue to be home to a wide range of diverse communities. We will support our 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.

These neighbourhoods will contain a broad mix of housing types, prioritising family and affordable housing, and will be served via a range of excellent, shared and accessible community, cultural and recreation facilities and infrastructure. These will be green, safe and accessible to all, promoting walking and cycling and the use of public transport as well as making best use of our network of parks and waterways, including Victoria Park, Mudchute Park and Mile End Park; the Thames and Lea rivers; and our dock basins and canals.

Neighbourhoods will be transformed with high quality buildings and well-designed spaces, while the character of the borough's 24 places that make Tower Hamlets unique will be protected and enhanced: ensuring a sensitive balance between, and integration of, old and new. High standards of environmental sustainability will result in improvements in air quality, carbon emissions, recycling and climate change mitigation. Innovative and smart technology will enhance the provision of services. This will ensure the on-going social and environmental sustainability of greater levels and higher densities of development.

Alongside high quality residential neighbourhoods, Tower Hamlets will play a significant role in London's global economy, ensuring it remains an evolving, creative and dynamic borough.

The strategic roles of Canary Wharf as a global financial and business hub and the City Fringe and Whitechapel as emerging hubs for life sciences, bio-tech and digital industries will be strengthened. This is alongside nurturing and developing our thriving small-and-medium enterprise sectors, properly recognising the need to support the entrepreneurial and business-focussed dynamism of many of our residents and workers, preserving our remaining industrial heritage and promoting our historic and distinctive town centres, markets and heritage and cultural attractions.

This economic growth will be sustained through the enhancement of our public transport network.

## 20 PART 2: VISION AND OBJECTIVES

- 1.2** Underpinning this vision is the desire to achieve the long term priorities and cross-cutting themes set out in the Tower Hamlets Community Plan (empowering residents; building resilience; promoting healthier lives; increasing employment; and responding to population growth) and other relevant strategies at the regional and national level.
- 1.3** This vision has been translated into a series of objectives and principles outlining how growth and regeneration across the borough and the aspirations of our communities will be achieved.

## Chapter 2: Key objectives and principles

- 2.1** In order to deliver this vision, the Local Plan has been shaped around two overarching objectives. Each objective is articulated through a series of principles and implementation actions.
- **Key objective 1: Managing growth and shaping change.**
  - **Key objective 2: Spreading the benefits of growth.**
- 2.2** The vision and objectives are illustrated within the key diagram overleaf (see figure 5). This diagram provides a spatial representation of the overall approach to managing growth and shaping change across the borough.
- 2.3** The next section (section 3) sets out a series of topic-based policies which will guide decisions on development and use of land within the borough, including the overall strategy on how this growth will happen and where it will take place.
- 2.4** A series of area-based visions have been developed to shape and coordinate the future planning of the following sub-areas: City Fringe, Central, Lower Lea Valley, Isle of Dogs and South Poplar. Section 4 describes what these areas will look like, how they will change and identifies the priorities and wider principles which will help create more distinctive, vibrant and sustainable places where people want to live, work and enjoy leisure (see section 4).
- 2.5** In addition, a number of significant development opportunities have been identified within these areas (known as site allocations – see section 4) to deliver new homes, jobs and supporting infrastructure.

## Key objective 1: Managing the growth and shaping change

Principles:

- Growth must contribute positively to existing identified social, economic and environmental needs.
- Growth must be delivered alongside social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported.
- Growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development.
- Growth must be well-designed and enhance the distinctiveness of our places, ensuring old and new are properly integrated.
- Growth must respect, protect and enhance our environment and our health and well-being.
- Growth must optimise the use of the best available technological innovations.

This objective will be implemented through:

1. delivering the borough's role as a key location for London's housing and employment growth, while seeking to overcome constraints to sustainable growth through regional and national investment prioritisation;
2. positively meeting our duties to deliver our strategic and local housing needs, linked to effective infrastructure planning and delivery;
3. securing the timely provision of sufficient infrastructure to meet current and future needs, taking account of the cumulative impact of future development, especially in deficient areas;
4. supporting additional transport investment (including improvements to bus, rail and river services, new river crossing opportunities and pedestrian and cycle connections) to support growth;
5. protecting a range of land uses (including a wide range of employment spaces, shops, leisure and community facilities) to support a truly mixed-use borough;
6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places;
7. strengthening the role of our town centres to encourage a broad range and mix of uses and activities and meet the needs of users;
8. creating walkable communities where residents, visitors and workers can easily access shops, services and facilities within town centres and neighbourhood centres;
9. protecting the uses, spaces and places, including parks and waterways, which make the borough unique;
10. delivering successful place making which conserves heritage assets and their settings; enhances local distinctiveness, character and townscapes;
11. encouraging the use of innovative building types and technologies in suitable locations to provide sustainable high quality internal and external living environments;
12. requiring developments to reach the highest standards of environmental sustainability and deliver a robust built environment which is designed to adapt to and reduce the effects of climate change;
13. achieving a zero carbon borough in the twenty first century, with a 60% reduction in carbon emissions by 2025; and
14. addressing poor air quality through a range of solutions, including a continuing modal shift away from polluting vehicles (including through traffic).

**Key objective 2: Sharing the benefits of growth**

## Principles:

- Growth must deliver social, economic and environmental net gains jointly and simultaneously and reduce inequalities, benefitting the lives of existing residents.
- Growth must promote community cohesion, ensuring the accessibility of spaces, places and facilities.
- Growth must enable community leadership and engagement.
- Growth must bring an improved quality of life, health benefits and reduce health inequalities.

## This objective will be implemented through:

1. reducing existing spatial inequalities and barriers and preventing the future polarisation of areas or communities, through optimising regeneration opportunities, in particular in the Lower Lea Valley, Isle of Dogs and South Poplar;
2. maximising opportunities to create a more connected and well-managed network of open spaces, habitats and waterways via new and improved green links and spaces (including the Leaway and Whitechapel Greenspine) and public realm works;
3. ensuring housing development contributes to the creation of socially balanced and inclusive communities and offers housing choice, reflecting our priorities for genuinely affordable and family homes;
4. helping to close the current skills gap, through improving access to education and training and increasing the mix of employment sectors;
5. optimising the economic benefits from the borough's proximity to world-class visitor attractions (including the Tower of London world heritage site) and encouraging visitors to explore more of the borough;
6. creating buildings, streets, spaces and places which promote social interaction and inclusion, which are accessible to all and which people value, enjoy and feel safe and comfortable in;
7. maximising the benefits of the new Elizabeth line, including the stations at Whitechapel and Canary Wharf, acting as a catalyst for investment;
8. delivering healthy streets and neighbourhoods that promotes active and healthy lifestyles and recreation and enhances people's wider health and well-being; and
9. enabling all residents to be involved within the planning system at the earliest opportunity, through consultation; making the process more transparent and accessible; and providing support for the process of neighbourhood planning.



# 24 PART 2: VISION AND OBJECTIVES

Figure 5 :The key diagram



## Chapter 1: Introduction

- 1.1** This section sets out the policies which will help deliver the vision and objectives of the Local Plan. We will use these policies to make decisions on planning applications and other relevant applications.
- 1.2** These policies will be used with the other documents that make up the development plan to guide development across the borough up to 2031.
- 1.3** The policies are arranged around the following themes.
- Achieving sustainable growth.
  - Creating attractive and distinctive places.
  - Meeting housing needs.
  - Delivering economic growth.
  - Revitalising our town centres.
  - Supporting community facilities.
  - Enhancing open spaces and water spaces.
  - Protecting and managing our environment.
  - Managing our waste.
  - Improving connectivity and travel choice.
- 1.4** The policies are split into two types (as described in section 1).
- Spatial policies provide overarching guidance to steer development opportunities across the borough.
  - Development management policies provide further detail on how development should be managed and implemented.
- 1.5** For each policy, links are included in the supporting text to other relevant policies and guidance (e.g. supplementary planning documents) which will inform individual development proposals.
- 1.6** Detailed guidance has also been developed to inform and shape the future planning and growth of specific locations within the borough where growth and change will be focussed (see section 4).

## Chapter 2: Achieving sustainable growth

- 2.1** The following policies set out a holistic approach to delivering sustainable development and growth in Tower Hamlets.
- 2.2** These policies directly underpin the vision and the strategic objectives set out in section 3. Together, they support our aspiration of achieving 'One Tower Hamlets' – a borough where everyone has an equal stake and status; where people have the same opportunities as their neighbours; and where people have a commitment and responsibility to contribute to the well-being of their communities. This is about reducing inequalities, promoting community cohesion and enabling community leadership and engagement.
- 2.3** This section contains the following policies.
- Policy S.SG1: Areas of growth and opportunity within Tower Hamlets
  - Policy S.SG2: Delivering sustainable growth in Tower Hamlets
  - Policy D.SG3: Health impact assessments
  - Policy D.SG4: Construction of new development
  - Policy D.SG5: Developer contributions

### Policy S.SG1: Areas of growth and opportunity within Tower Hamlets

1. New development within the borough will be directed towards:
  - a. the opportunity areas (City Fringe, Lower Lea Valley and Isle of Dogs and South Poplar); and/or
  - b. highly accessible locations along transport corridors.
2. Development is required to demonstrate how it will address the priorities and principles within these opportunity areas as well as the Central sub-area. Development within or part of a site allocation is required to deliver the identified land uses, infrastructure requirements and design and delivery principles.
3. The majority of new housing and employment provision within the borough will be focussed within the Isle of Dogs and South Poplar opportunity area, principally within Canary Wharf and north of the Isle of Dogs. Significant amounts of new housing will also be delivered in the City Fringe and Lower Lea Valley (including the Poplar Riverside Housing Zone) opportunity areas.
4. The borough's town centres will continue to be the focus of shopping, leisure, cultural and community activities and will include a broad range of uses that are accessible to a significant number of people via foot, cycle or public transport.
5. The continued growth of Canary Wharf (as defined on figure 5) will be promoted to support its strategic role as a metropolitan centre serving the needs of the neighbourhood and the wider area, and to better integrate the public realm and development opportunities with adjoining areas around Poplar and the Isle of Dogs.
6. Canary Wharf and the City Fringe will continue to act as a key focus for financial and business services. Biotech, life sciences and digital industries will be primarily concentrated in the City Fringe opportunity area (including Whitechapel) to support the development of the Tech City and Med City clusters, and a new civic centre will be developed on the site of former Royal London Hospital at Whitechapel.



7. Development will be required to support the delivery of significant new infrastructure to support growth within the four sub-areas, including:
- improvements to the transport network (including Crossrail 2);
  - green grid projects (including the Lea River Park and Whitechapel Green Spine); and
  - social infrastructure, such as schools, open space, health centres and leisure facilities.

### Explanation

- 2.4** This policy sets out the broad locations and opportunity areas within the borough where growth and investment will be targeted over the lifetime of the plan.
- 2.5** The London Plan (GLA, 2016) has identified three opportunity areas (City Fringe, Lower Lea Valley and Isle of Dogs and South Poplar) in the borough which have significant potential to accommodate new development (especially on brownfield land) and support urban renewal. These areas are shown on the key diagram (see figure 5).
- 2.6** Development will also be focused in highly accessible locations with good links to public transport, cycling and walking networks and designated town centres in line with policies S.TC1 and S.TR1.
- 2.7** The remaining part of the borough is defined as the Central sub-area (see figure 5). Whilst not having the status of an opportunity area, this area has the potential to absorb additional growth, primarily through infill and land use intensification which respects the character of the surrounding streetscape.
- 2.8** The Local Plan outlines how these areas will look and develop in the future. New development will be expected to have regard to the design and development principles set out in section 4 and other relevant

policies set out in the Local Plan. In particular, these policies will be used as a place-making tool in the development management process to manage growth and deliver associated infrastructure in a coordinated and timely manner in line with the overall vision and objectives of the Local Plan.

- 2.9** Each sub-area (as shown on the policies map) is distinctive and new development will need to respond to their individual characteristics to facilitate distinct neighbourhoods and healthy and liveable places where people want to live, work and enjoy leisure.
- 2.10** The Local Plan also seeks to protect and enhance the character and distinctiveness of the borough's 24 places that make up each of the four sub-areas (see figure 4). Development within the sub-areas will be expected to have regard to the distinct characteristics of the borough's 24 places, as defined within the Tower Hamlets Urban Structure and Characterisation Study and other relevant guidance, such as conservation area appraisals, design guides and supplementary planning documents.
- 2.11** Sites have been identified across a range of locations within each of the sub-areas to address the housing and employment needs of the borough as well as facilitate the delivery of key supporting infrastructure, such as publicly accessible open space and schools. These sites (known as allocations) are shown on the Policies Map<sup>(12)</sup>. Further information on the detailed site-specific requirements that will inform the design, scale and layout of new development within these allocations is set out in section 4.
- 2.12** Tech City (as identified on figure 5: the key diagram) is a strategically important business cluster within the heart of the City Fringe sub-area, centred on digital and creative companies, particularly around Shoreditch, Spitalfields and Whitechapel. Whitechapel will also be home to a new state-of-the-art life science research hub (known as Med City) around the existing Queen Mary University campus and Royal London Hospital site alongside residential and commercial uses. This policy seeks to

<sup>12</sup> Please note: allocations are sites that can deliver over 500 new net additional homes or sites that can provide a significant quantum of employment floorspace and jobs alongside key infrastructure.

support the continued expansion of this cluster and strengthen the links between bio-tech and life science facilities, including the provision of affordable and shared workspace (see part 5 above).

**2.13** Canary Wharf (as identified on the key diagram) is a financial and business district of national and international importance. The London Plan sets out an aspiration to re-designate Canary Wharf as a metropolitan centre (as defined in the glossary) due to its potential to serve a wide catchment area over several boroughs and into parts of the wider South East region. Our evidence suggests that Canary Wharf is already fulfilling this role and policies in this plan provide guidelines to help facilitate and support this designation (see policies S.TC1 and S.EMP1).

**2.14** Town centres are the economic, transport, social and civic hearts of our communities and offer the greatest accessibility to jobs, services, shops and public transport. They are relatively vibrant and healthy and many have benefitted from growth and investment in recent years. Like many other centres in London, our town centres and high streets face particular challenges in the face of global competition, the internet and fluctuations in the property market; and they need to diversify to attract more people and businesses throughout the day and evening as well as meet changing customer demands. These centres have been classified according to their existing roles and functions (see policy S.TC1) and each performs a different but complementary role.

**2.15** Significant levels of development and resulting population growth will result in the need to deliver a range of facilities, services and infrastructure, such as new schools, open space provision, health facilities and shops. However, much of the borough's existing infrastructure is at and close to full capacity and in many cases requires investment. Developers are therefore expected to contribute towards meeting the additional infrastructure needs arising from new development. Further details (including the mechanisms through which developers will be expected to contribute towards infrastructure provision) are outlined in policy D.SG5 and section 4.

**2.16** This policy will be implemented through a number of mechanisms such as supplementary planning guidance, master plans and opportunity area frameworks, which provide more detailed guidance to coordinate and manage development alongside the London Plan.

### Policy links

- All policies

### Evidence links

- London Plan (GLA, 2016)
- City Fringe Opportunity Area Planning Framework (GLA, 2015)
- Whitechapel Vision Masterplan (2013)
- Lower Lea Valley Opportunity Area Planning Framework (GLA, 2007)
- Tower Hamlets Conservation Strategy (2017)
- Tower Hamlets Urban Structure and Characterisation Study (2009 & 2016)
- Tower Hamlets Infrastructure Delivery 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:
  - a. delivers managed growth, through:
    - i. good design;
    - ii. preserving or enhancing the character and setting of the area; and
    - iii. not resulting in unacceptable impacts on the natural and historic environment and its assets, transport capacity and infrastructure.
  - 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; and
    - vi. delivering social and transport infrastructure and public realm improvements which are inclusive and accessible to all.

**Explanation**

- 2.17** This policy seeks to deliver sustainable development and growth in Tower Hamlets, addressing the specific social, environmental and economic challenges facing the borough. It seeks to ensure each individual development positively contributes to implementing and delivering the vision and objectives of the plan.
- 2.18** For the purposes of this policy, we will consider the application and design in its entirety and in relation to its surroundings. Impacts will be considered unacceptable when they do not meet the standards and requirements provided in the policies in the plan or where they result in negative impacts that cannot be adequately mitigated.
- 2.19** Improving health and wellbeing in the borough is a key priority in our Community Plan, reflecting the borough's significantly high levels of poor health outcomes. This policy seeks to address high levels of poor health in the borough, which environmental improvements can help to reduce.
- 2.20** The design of the built environment and the provision of accessible services are able to directly contribute to reducing inequalities (including health inequalities) and promoting community cohesion. This policy addresses these objectives and helps to ensure the continued delivery of 'One Tower Hamlets' via the built environment and development process. Planning has a particular role to play in ensuring the built environment is accessible to those with physical impairments and this is addressed in part b.vi above. In order to demonstrate compliance, developments will be expected to provide details within the planning application statement, identifying how they have met the principles outlined above.

**Policy links**

- All policies

## Evidence links

- Tower Hamlets Community Plan (2015)

## Policy D.SG3: Health impact assessments

1. The following developments are required to complete and submit a health impact assessment as part of the planning application.
  - a. Major developments.
  - b. Development within an area of sub-standard air quality (as shown on the Policies Map).
  - c. Developments which contain any of the following uses:
    - i. Education facilities.
    - ii. Health facilities.
    - iii. Leisure or community facilities.
    - iv. A5 uses (hot-food takeaways).
    - v. Betting shops.
    - vi. Publicly accessible open space.
2. Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a detailed health impact assessment as part of the planning application.

## Explanation

- 2.21** This policy seeks to ensure development contributes towards a healthy built environment in accordance with the London Plan (GLA, 2016) and the objectives of the Tower Hamlets Health and Wellbeing Strategy (2017). Developments containing those uses which are most likely to impact health outcomes or are in locations which may impact on health outcomes are required to undertake a health impact assessment.
- 2.22** Health impact assessments should be undertaken using the recommended guidance from our public health service (for example, the latest Healthy Urban Planning Checklist (Healthy Urban Development Unit)).

- 2.23** Part 1 refers to areas of sub-standard air quality: these are areas where nitrogen dioxide levels exceed  $40 \mu\text{g}/\text{m}^3$  (the European Union legal limit). This includes areas in which fine particulate matter (PM2.5) levels exceed  $10 \mu\text{g}/\text{m}^3$  annual mean PM2.5 (World Health Organisation guideline limits). These areas are outlined on the Policies Map.
- 2.24** Part 2 states that developments of a scale referable to the Greater London Authority (as defined in the glossary in appendix 1) will be expected to complete a more extensive health impact assessment. Further guidance on how these assessments should be undertaken will be available from our public health service. A health impact assessment can also be submitted as part of an integrated impact assessment.
- 2.25** The health impact assessment should outline how the development could positively or negatively impact on the wider determinants of health and should identify actions to enhance the positive impacts and mitigate the negative impacts. The outcome of these actions should be clearly identifiable within the planning application.

- Tower Hamlets Air Quality Annual Monitoring Report (2016)
- Health Impact Assessment Matrix (London Healthy Urban Development Unit)

#### Policy links

- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality
- Policy D.TC4: Financial and professional services
- Policy D.TC6: Food, drink, entertainment and night-time economy
- Policy S.CF1: Supporting community facilities
- Policy D.CF2: Existing 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 D.ES2: Air quality

#### Evidence links

- Health Issues in Planning Best Practice Guidance (GLA, 2007)

## Policy D.SG4: Planning and construction of new development

1. All major development should sign up to the considerate constructors scheme and where appropriate a constructors forum. During construction, major development is required to:
  - a. comply with the non-road mobile machinery low emission zone requirements;
  - b. minimise levels of noise, vibration, artificial light, odour, air quality, fumes or dust pollution;
  - c. consider the routing, timing and frequency of heavy goods vehicle movements to reduce their impact on vulnerable road users, local amenity and congestion;
  - d. use, where available, construction and/or freight consolidation centres; and
  - e. consider the impact of construction on the water supply, flood risk and drainage and implement suitable mitigation measures where required.
2. Major development must consider the cumulative impact of other major development occurring in the vicinity on levels of noise, vibration, artificial light, odour, air quality, fumes or dust pollution, and plan timings of works, delivery timings and routes and location of equipment accordingly to reduce this cumulative impact.
3. Development is required to employ the highest standards of sustainable construction, including:
  - a. sustainable construction methods, such as the use of sustainably sourced and recycled materials; and
  - b. the use of demolished material from the development site, where practicable, in order to minimise the transportation of waste and reduce carbon dioxide emissions.

## Explanation

- 2.26** This policy recognises that the high levels of growth within the borough are mainly taking place alongside, or within, areas which are already densely inhabited. It therefore seeks to ensure development minimises its impact on the local environment and existing communities.
- 2.27** Developers will be expected to sign up to the considerate constructors scheme and a constructors forum (where appropriate) to better manage and mitigate the cumulative impacts arising from construction on the borough's key development sites.
- 2.28** The considerate constructors scheme is a national initiative which seeks to promote safe and considerate building practice and engineering works and improve standards of neighbourliness. Sites that are registered under the scheme are independently assessed and monitored against a code of considerate practice, designed to encourage higher standards of conduct. We may also consider membership of alternative constructor schemes as also meeting the requirements of this policy.
- 2.29** Further detail on implementing part 1 (a) is provided in Control of Dust and Emissions Supplementary Planning Guidance (GLA, 2014).
- 2.30** Compliance with part 1 (b) should be evidenced within an air quality (dust) management plan, using the methodology, measures and monitoring process outlined in the Control of Dust and Emissions Supplementary Planning Guidance. In order to demonstrate compliance with part 1 (c and d), where appropriate, a construction logistics plan should be submitted in line with relevant Transport for London guidance. In addition, applicants may wish to submit proof of membership of the fleet operator recognition scheme and/or direct vision standard for heavy good vehicles.
- 2.31** Cumulative impacts arising from other major development building works within one kilometre radius of the proposal site should be assessed and mitigation actions identified (see part 2). This should be evidenced through the construction logistics management plan. Further guidance on producing a construction logistics management plan can be found in the Sustainable Design and Construction Supplementary Planning Guidance and our latest code of construction practice.



**2.32** We seek to reduce development waste and encourage the process of limiting waste to begin early in site development. The design and materials used in the construction of new buildings (including the need to choose sustainable materials and sustainable construction methods) can make a significant difference to the energy requirements and associated level of carbon emissions. In order to address part 3 of the policy, applicants should evidence how the development will meet this requirement in the design and access statement and/or the sustainability statement, as part of the planning application. More detailed guidance can be found in the Sustainable Design and Construction Supplementary Planning Guidance.

**Policy links**

- Policy S.DH1: Delivering high quality design
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy D.ES9: Noise and vibration
- Policy D.ES2: Air quality
- Policy S.TR1: Sustainable travel
- Policy D.TR2: Impacts on the transport network
- Policy D.TR4: Sustainable delivery and servicing

**Evidence links**

- Control of Dust and Emissions Supplementary Planning Guidance (GLA, 2014)
- Sustainable Design and Construction Supplementary Planning Guidance (GLA, 2014).

**Policy D.SG5: Developer contributions**

1. Developments will be expected to:
  - a. pay community infrastructure levy charges required by any charging schedules which are in operation for the area within which the development is located, including the Mayor of London’s community infrastructure levy;
  - b. enter into section 106 agreements to provide affordable housing and make provision to mitigate the impacts of the development where necessary or appropriate, having regard to any relevant supplementary planning documents or guidance; and
  - c. submit a financial viability assessment as part of the planning application, where required, which may be subject to independent scrutiny by appointed experts, at the applicant’s cost, where they do not meet planning policy requirements or do not propose to deliver required section 106 planning obligations.
2. Vacant building credit has the potential to adversely impact our ability to meet the affordable housing target and will not apply in the borough. This policy acts as an exemption from its application in Tower Hamlets.

**Explanation**

**2.33** In order to ensure that the policies of the Local Plan are delivered in a way that achieves sustainable development, we will seek contributions from developers to fund improvements to infrastructure and the environment. Contributions will be made through the community infrastructure levy (which applies a standard charge to developers to fund supporting infrastructure such as transport, schools, community facilities and health centres) and/or section 106 agreements (which address the provision of affordable housing and more site-specific infrastructure requirements).

**2.34** The spatial vision and objectives (see section 3) emphasise the importance of managing growth and shaping change. This puts planning for infrastructure at the heart of the Local Plan, ensuring that new

development in the borough contributes towards the provision of the infrastructure that is needed to support growth and enable everyone in the borough to benefit from the opportunities this will bring.

**2.35** Developer contributions can help to contribute to the success of a development and the needs of the wide community in line with the key priorities set out in sections 2 and 4. For instance, they can enhance the quality of a development and ensure it does not give rise to unacceptable development impacts.

**2.36** We will work collaboratively with our partners to deliver the infrastructure necessary to support the growth and development identified within the Local Plan, understanding the contribution that this growth can make to achieve the wider objectives of the plan and other relevant strategies. The Infrastructure Delivery Plan identifies the types of infrastructure required to support the anticipated growth in the borough and includes a summary of currently identified infrastructure projects. The Infrastructure Delivery Plan will be reviewed regularly, and where necessary, updated in consultation with both internal and external stakeholders, such as other service areas and infrastructure providers.

**2.37** In order to implement part 1 (a) development must follow both the borough-wide community infrastructure levy charging schedule, or any subsequent adopted version; and the Mayor of London's community infrastructure levy charging schedule, or any subsequent adopted version, and supplementary planning guidance.

**2.38** The borough-wide community infrastructure levy (which was adopted in April 2015) will be used to deliver infrastructure in line with the Regulation 123 List, which sets out the projects or types of infrastructure we intend will (or may) be wholly or partly funded through this levy. Necessary items required to mitigate the impact of development that are not on the Regulation 123 List, such as affordable housing, may be secured through section 106 obligations.

**2.39** The Mayor of London's community infrastructure levy will help fund strategic transport projects (e.g. Crossrail 2). We collect these receipts from developments in Tower Hamlets and pass them onto Transport for London. Developments in the borough may be liable for both the Mayoral and borough-wide community infrastructure levy and, in certain

circumstances, pursuant to supplementary planning guidance, the Mayor of London may also require a section 106 financial contribution from office, retail and hotel developments.

**2.40** Part 1 (b) seeks to address the use of section 106 planning obligations to secure the provision of affordable housing and mitigate the impact of development where these cannot be addressed through the community infrastructure levy. Section 106 planning obligations will be sought where they are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

**2.41** The Planning Obligations Supplementary Planning Document provides detailed guidance on our approach to planning obligations. The measures sought through a planning obligation will vary depending on the nature and scale of a development, its location and impacts. Development which is subject to a section 106 agreement should apply this document, and will be assessed on an individual basis.

**2.42** Financial contributions may be sought financially or 'in kind' – where the developer builds or directly provides the matters necessary to fulfill the obligation negotiated as part of the planning application. Where provision is made within developments, this will be credited to the scheme and may offset financial contributions that may otherwise be sought. However, financial contributions may be secured for reasonable fitting out and infrastructure costs and this is determined on a case-by-case basis.

**2.43** Part 1 (c) aims to ensure developers maximise contributions towards the delivery of affordable housing and infrastructure in line with the vision and objectives of the plan, whilst still ensuring development can be delivered. Development should follow the guidance set out in the Development Viability Supplementary Planning Document. This sets out how the Local Plan policies should be applied in a development viability context when determining planning applications. It aims to provide greater clarity to both applicants and the general public and ensures that the principles of sustainable development are at the forefront of decision-making in Tower Hamlets.



- 2.44** Financial viability is a key consideration in terms of the application of section 106 planning obligations, and where development does not meet planning policy or propose to provide required planning obligations, financial viability assessments are required to be submitted in accordance with the prevailing local validation requirements checklist or any relevant supplementary planning document. The issue of financial viability should be considered at the earliest opportunity. If an applicant is engaged with us in this regard prior to the submission of a planning application, then the chances of a positive outcome for all sides are greatly increased.
- 2.45** Part 2 sets out our approach to the application of the vacant building credit, which provides an incentive for brownfield development on sites containing vacant buildings. Viability evidence finds there is no need to apply the vacant building credit mechanism in the borough to 'kick start' development<sup>(13)</sup>. In addition, the effect of the vacant building credit will be to reduce affordable housing contributions and this is contrary to our need to deliver affordable housing through the planning system<sup>(14)</sup>. The 'Homes for Londoners - the Affordable Housing and Viability Supplementary Planning Guidance sets out the extent to which vacant building credit should be applied in London and concludes that its application is unlikely to be suitable in London.

#### Evidence links

- Tower Hamlets Planning Obligations Supplementary Planning Document
- Tower Hamlets Development Viability Supplementary Planning Document
- Affordable Housing and Viability Supplementary Planning Guidance (GLA, 2017)

#### Policy links

- Policy S.H1 Meeting housing need
- Policy D.H2 Affordable housing
- Policy S.CF1: Supporting community facilities
- Policy D.CF3: New and enhanced community facilities
- Policy S.TR1: Sustainable travel
- Policy D.TR2: Impacts on the transport network
- Policy D.TR3: Parking and permit-free
- Policy D.TR4: Sustainable delivery and servicing
- Policy D.ES7: A zero carbon borough
- Policy D.WM2: New and enhanced waste facilities

13 Tower Hamlets Local Plan Viability Assessment (2017)

14 Tower Hamlets Strategic Housing Market Assessment (2017)

## Chapter 3: Creating attractive and distinctive places

### Introduction

**3.1** The borough consists of a number of distinctive, diverse and vibrant places such as historic hamlets, ancient markets, urban parks, inland docks, urban farms and a world heritage site. Together, the characteristics of these places make up the distinct identity of the borough, and have evolved gradually over many years. More recently, the pace and scale of growth within the borough and across London has threatened the fabric of these unique places.

**3.2** The policies in this chapter seek to ensure that new development is well-designed, safe, accessible, inclusive and respects the distinctive character of our places, paying careful attention to the layout, scale and form of buildings and spaces, the connections between them, and the mitigation of impacts, such as noise and air pollution.

**3.3** This section contains the following policies.

- Policy S.DH1: Delivering high quality design
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy S.DH3: Heritage and the historic environment
- Policy D.DH4: Shaping and managing views
- Policy S.DH5: World heritage sites
- Policy D.DH6: Tall buildings
- Policy D.DH7: Density
- Policy D.DH8: Amenity
- Policy D.DH9: Shopfronts
- Policy D.DH10: Advertisements, hoardings and signage
- Policy D.DH11: Telecommunications

### Policy S.DH1: Delivering high quality design

1. Development is required to meet the highest standards of design, layout and construction which respects and positively responds to its context, town scape, landscape and public realm at different spatial scales, including the character and distinctiveness of the borough's 24 places (as shown on figure 4) and their features. To achieve this, development must:
  - a. be of an appropriate scale, height, mass, bulk and form;
  - b. provide coherent building lines and setbacks, roof lines and roof forms, street scape rhythm and other street scape elements as well as optimal plot coverages to avoid over-development;
  - c. ensure the architectural language, design details, elements and materials applied on elevations, roof forms and landscapes (including boundary treatment) reflects their immediate and wider surroundings;
  - d. reuse existing buildings with better quality design where feasible and where it would not compromise the quality of development;
  - e. protect important views of and from landmark buildings and vistas;
  - f. use high quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development, including residential development and social housing;
  - g. create well-connected and integrated spaces and buildings which can be easily adaptable to different uses and the changing needs of users;
  - h. incorporate features of positive biodiversity value within the site, where possible;
  - i. take into account the effects on the micro climate and use design and construction techniques to reduce and mitigate the impact of noise, overheating and air pollution, while optimising energy and waste efficiency; and
  - j. provide a mix and range of publicly accessible open spaces that promote biodiversity, health and well-being.

**Explanation**

- 3.4** High quality design lies at the heart of our plans to grow and expand Tower Hamlets, helping to ensure it remains one of the most dynamic and attractive parts of London. We are seeking to achieve excellence in the quality of our buildings and spaces which benefit Tower Hamlet's location within the heart of London and its world-class urban environment. The purpose of this policy is to outline the key elements of high quality design so that we create buildings, spaces and places that are sustainable, accessible, attractive, durable and well-integrated into their surroundings and are sensitive to the character of the area, contributing to a high quality of life and well-being.
- 3.5** The character and places of the borough are described in more detail in sections 2 (setting the scene) and 4 (delivering place-making) of the plan and other relevant studies (e.g. Tower Hamlets Urban Structure and Characterisation Study).
- 3.6** Parts a to c provide detailed guidance to ensure that the design and layout of new development is considered in the wider context and is sensitive to the existing character and identity of the area, taking account of the opportunities to improve health and well-being.
- 3.7** Part d offers a sustainable approach to buildings which are valued or capable of being reused.
- 3.8** Part e refers to views which are locally distinctive and which residents, workers and visitors of the borough recognise and value. In particular, development proposals will need to take account of the views identified in policy D.DH4 and shown on figure 7.
- 3.9** Part f seeks to ensure that new development (including materials and finish) is designed and built as robustly and durably as possible to support its users and reduce the need to make additional alterations following construction, particularly where it is associated with family living, social housing and specialist accommodation. Planning applications (including temporary permissions) will need to include technical information regarding materials and finishes to demonstrate their longevity, quality and relationship to the local context.

- 3.10** Part g seeks to ensure that buildings and spaces are designed to be convenient for a wide range of users, including wheelchair users, elderly people with reduced mobility and families with young children. Buildings and spaces should be designed to be adaptable and flexible from the outset, enabling them to respond to the changing needs and lifestyles of the occupier and allow for a variety of uses over time.
- 3.11** Part i highlights the importance of integrated sustainable solutions to managing climate change and maximising opportunities to make more efficient and prudent use of energy and waste in line with policies S.SG2 and D.SG4.
- 3.12** Part j seeks to promote the provision of open spaces in the borough and recognises their importance for the health and well-being of the local community as well as their contribution to biodiversity and landscape (as set out in part h).

**Policy links**

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG4: Construction of new development
- Policy D.H3: Housing standards and quality
- Policy S.TC1: Supporting the network and hierarchy of centres
- Policy S.CF1: Supporting community facilities
- Policy S.OWS1: Creating a network of open spaces
- Policy S.OWS2: Enhancing the network of water spaces

**Evidence links**

- Streets Toolkit (Transport for London, 2017)
- Character and Context (GLA, 2016)
- Tower Hamlets Urban Structure and Characterisation Study (2009 & 2016)

## 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. improving connectivity to public transport hubs, town centres, open 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.
2. Development is also required to positively contribute to the public realm through:
  - a. optimising active frontages towards public streets and spaces;
  - b. providing clear definitions and enclosure through building frontage and massing, and connection and continuity of pedestrian desire lines and street activities, at a human scale;
  - c. providing a range of public spaces that can function as places for social gatherings and other recreational uses;
  - d. reducing visual clutter and obstacles in the public realm of the scheme and the adjacent area;
  - e. ensuring balconies do not over-hang on the public highway or onto neighbouring properties;
  - f. resisting the creation of gated communities;
  - g. integrating refuse and recycling facilities within the building envelope;
  - h. using high quality paving slabs, bricks and pavers for footways, parking spaces and local streets to create attractive, accessible, comfortable and usable development;
  - i. integrating high quality public art into the public realm, especially at gateway locations or other appropriate landmarks, and

retaining existing good quality art in the locality of new development, where possible;

- j. ensuring that soft landscaping is maximised to soften the streetscape and provide visual and environmental relief from hard landscaping, buildings and traffic.
- k. locating entrances in visible, safe and accessible locations;
- l. creating opportunities for natural surveillance, particularly at ground floor level;
- m. designing out concealment points and leftover spaces; and
- n. creating clear sightlines and improving legibility and lighting of the surrounding area at all times of the day and night.

### Explanation

**3.13** This policy aims to deliver an attractive, accessible and well-designed network of streets and spaces which promote social interaction and inclusion where people of all ages and abilities can value and enjoy, and where they feel safe and comfortable.

**3.14** As Tower Hamlets has some of the highest population densities in London, the quality of our streets and spaces is important to maintain and create a high quality of life. The public realm in the borough varies considerably, from the high quality treatments around Canary Wharf (e.g. natural stone paving and tree planting) and conservation areas, through to the isolated, post-war streetscapes beyond Canary Wharf and Aldgate, as well as the severance arising from major arterial routes (e.g. East Cross Route, Aspen Way and The Highway) around Bow, Poplar, Limehouse and the Tower of London.

**3.15** Part 1 seeks to improve connectivity, permeability and legibility, especially around key transport interchanges, town centres and community hubs around the borough, whilst maintaining existing routes through or adjacent to development sites to allow continued access during the construction of development.

**3.16** Connectivity refers to the number of connections and their integration, layout and relationship to one another and the impact this has when moving from one point to another. Permeability refers to the variety of

pleasant, convenient, accessible and safe routes through an area and the capacity of those routes to carry the movement of people, whilst avoiding visual clutter in the streetscape and barriers to pedestrian/cycle movement as much as possible. Legibility is the degree to which a place can be easily understood and moved around in and can be called 'way-finding'.

- 3.17** In order to improve accessibility and increase movement, new development will also be required to follow a street hierarchy that puts pedestrians and cyclists first and promotes streets as links for movement and as places in their own right to ensure a strategic, accessible and safe street network across the borough. This hierarchy consists of:
- main streets – focusing on movement and prioritising the safe and convenient flow of buses and cyclists;
  - secondary streets – balancing movement between vehicles, cyclists and pedestrians, with attractive and convenient places where people gather; and
  - local streets – protecting and enhancing the character and social gathering function that streets provide, alongside their function of providing safe and convenient access to individual properties.
- 3.18** In addition, part 1 seeks to embed the principles of secured by design into the design and layout of new development. Where there is a need to ensure the safety of streets and public spaces, particularly crowded places, the correct level of protection should be provided without compromising the ability to create aesthetic and functional public spaces. Proposals should not impose undue restrictions on other occupiers in the area.
- 3.19** Part 2 places public realm as a central component to the design of a development to ensure it is comfortable and functional, well-integrated with surrounding areas (including London's green grid network) and supports the delivery of successful and vibrant places.
- 3.20** Development should create streets and spaces with a degree of enclosure by assisting in defining the edges of the public realm, through continuous building lines and active frontages. Development should avoid creating

concealment points and external lighting should be an integral development component in ensuring safety and security within the public realm in line with the principles of secured by design.

- 3.21** Proposals should also use complementary elements - such as materials, finishes, furniture, landscaping, signage and lighting - to ensure that development and the public realm is at a human scale and puts people at the heart of the design process, so that the importance of how people view and feel about their environment is recognised. This should include ensuring design features meet the health and well-being needs of people (for example, the provision of shade, shelter and places to rest, including seating with supportive backs).
- 3.22** Development should aim to ensure building frontages are active and minimise visual and physical obstruction and street clutter. Refuse and recycling facilities should be sensitively and conveniently located so that they are easily accessible by residents and operatives.
- 3.23** Gated communities do not contribute to a well-connected, accessible and permeable public realm. They may also have a negative impact on sustainable communities and social cohesion.
- 3.24** Balconies overhanging on the public footway or highway or neighbouring properties have the potential to harm the safety and amenity of local occupiers, residents and the public highway as well as cause overlooking into neighbouring properties or on to the highway, especially at the ground floor level.

#### Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.H3: Housing standards and quality
- Policy S.CF1: Supporting community facilities
- Policy S.OWS1: Creating a network of open space
- Policy S.OWS2: Enhancing the network of water spaces
- Policy D.OWS3: Open space and green grid network
- Policy D.MW3: Waste collection facilities in new development



- Policy S.TR1: Sustainable travel
- Policy D.TR2: Impacts on the transport network

## Evidence links

- Streets Toolkit (Transport for London, 2017)
- Character and Context (GLA, 2014)
- Tower Hamlets Urban Structure and Characterisation Study (2009 & 2016)

## Policy S.DH3: Heritage and the historic environment

1. Proposals must preserve or where appropriate enhance the borough's historic designated and non-designated assets in a manner appropriate to their significance as key and distinctive elements of the borough's 24 places.
2. Proposals to alter, extend or change the use of an historic asset or proposals that would affect the setting of a heritage asset will only be permitted where:
  - a. they safeguard the significance of the heritage assets, including its setting, character, fabric or identity;
  - b. they are appropriate in terms of design, height, scale, form, detailing and materials in their local context;
  - c. they enhance or better reveal the significance of assets or their settings;
  - d. they preserve strategic and locally important views, as defined in policy D.DH4; and
  - e. in the case of a change of use from a use for which the building was originally designed, a thorough assessment of the practicability of retaining its existing use has been carried out outlining the wider public benefits of the proposed alternative use.
3. Applications affecting the significance of a heritage asset will be required to provide sufficient information to demonstrate how the proposal would contribute to the asset's conservation. Any harm to the significance of a heritage asset must be justified having regard to the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset. Factors that will be considered can include:
  - a. the significance of the asset, architecturally, historically and contextually;

- b. the adequacy of efforts made to retain the asset in use; and
  - c. the merits of any alternative proposal for the site.
4. Substantial harm to or the total loss of significance of a designated heritage asset will only be supported where it is necessary to achieve substantial public benefits that outweigh that harm or loss, or the following criteria can be satisfied.
    - a. The nature of the heritage asset prevents all reasonable uses of the site.
    - b. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation.
    - c. Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible.
    - d. The harm or loss is outweighed by the benefit of bringing the site back into use.
  5. Alterations, extensions or changes of use, or development in the vicinity of listed buildings will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings.
  6. Significant weight will be given to the protection and enhancement of the borough's conservation areas, including their setting. Development within a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance. There will be a presumption in favour of the retention of unlisted buildings that make a positive contribution to the character and appearance of a conservation area. Planning applications should explore opportunities from new development within conservation areas and their setting to enhance or better reveal their significance.
  7. Significant weight will be given to the protection and enhancement of scheduled monuments and other non-designated archaeological sites of equivalent importance. Any harm to their significance must be justified having regard to the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have

been made to mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to sustain the asset.

8. Applications affecting the significance of the archaeology will be required to provide sufficient information to demonstrate how the proposal would contribute to the asset's conservation. Where the development includes or has the potential to include heritage assets with archaeological interest, an appropriate desk-based assessment and, where necessary, field evaluation will be required. Where harm can be fully justified, we will require archaeological excavation and/or recording as appropriate, followed by analysis and publication of the results.
9. Development that lies in or adjacent to archaeological priority areas (as shown on the Policies Map) will be required to include an archaeological evaluation report and will require any nationally important remains to be preserved permanently at the site, subject to consultation with Historic England.
10. We will seek to ensure the protection and appropriate enhancement of the borough's historic parks and gardens. Development proposals should therefore safeguard those features which form an integral part of the special character or appearance of the park or garden and ensure they do not detract from the enjoyment, layout, design, character, appearance or setting of the park or garden, key views into and out of the park, or prejudice its future restoration. Where development is likely to affect a historic park and garden or its setting, applications should include a heritage impact assessment setting out the likely impact which it would have upon its significance and the means by which any harm might be mitigated.

## Explanation

- 3.25** Tower Hamlets has a very rich heritage with enormous diversity and variety (visible historic buildings, structures, parks and open spaces, key views, buried archaeology as well as heritage collections) which is widely valued, cared for and celebrated.
- 3.26** Tower Hamlets has a higher proportion of scheduled monuments, listed buildings and conservation areas compared to that of other London boroughs. Some of the key elements of the borough's heritage include:
- military and naval buildings (e.g. Tower of London);
  - museums, art galleries, music halls and breweries (e.g. Bethnal Green Museum of Childhood and Wiltons Music Hall);
  - squares, cemeteries and parks and gardens;
  - indoor and outdoor markets (e.g. Spitalfields);
  - industrial heritage and archaeology;
  - residential streets and buildings of Georgian and Victorian origin;
  - innovative post-war housing (e.g. Keeling House and Balfron Tower); and
  - religious and education institutions (e.g. Christ Church, Spitalfields and Tonybee Hall).
- 3.27** Our heritage assets are exceptionally important - they are our most recognisable landmarks and most cherished places, and they contribute to reinforcing the unique character and distinctiveness of the borough (including its 24 places) as well as London as a whole.
- 3.28** This policy sets out how the historic environment should inform development, how planning applications will be assessed and how opportunities can be taken to improve the condition of the borough's historic environment (including individual assets and their settings) to ensure that its distinctive character is maintained.
- 3.29** In order to satisfy the criteria set out in parts 2-9, developments will need to demonstrate an understanding of the significance of the relevant asset or its setting as part of the planning application process. As a minimum, this should include both desktop analysis and on-site investigation, with reference to the Greater London Historic Environment Record and other relevant documentation. The borough has a local

history library, which provides a useful resource. Research undertaken into the heritage asset affected should describe the significance of the heritage asset in sufficient detail to determine its historic, archaeological, architectural or artistic interest to a level proportionate to its importance. The Greater London Historic Environment Record will help inform whether a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest.

- 3.30** Detailed plans to an appropriate level will need to be submitted with applications as part of design and access statements/heritage statements to demonstrate how the heritage assets and its setting will be impacted and to ensure that its significance is protected or enhanced.
- 3.31** Where a new heritage asset is discovered, the developer will be expected to work with us to seek a solution that protects the significance of the new discovery, so far as is practicable within the existing scheme. Depending on the importance of the discovery, modifications to the scheme being implemented may be required.
- 3.32** In relation to parts 1 and 4, designated heritage assets include listed buildings and structures, registered parks and gardens and conservation areas. We will not permit harm to or total loss of a designated heritage asset unless the benefits of the proposal outweigh the harm or the criteria set out in part 4 can be met.
- 3.33** In particular, listed buildings and structures in the borough make an important and valued contribution to the character and appearance of the borough and provide places to live and work in, well-known visitor attractions and cherished local landmarks. We have a duty to preserve and maintain these assets for present and future generations.
- 3.34** Proposals relating to works to a listed building or within the vicinity of a listed building will be required to demonstrate that it will not affect the special interest of the listed building. In addition to planning permission, listed building consent may also be required for works that will affect the special character of a listed building.



- 3.35** When considering proposals within conservation areas, as set out in part 6, consideration will be given to the relative significance of the element affected and its contribution to the significance of the conservation area as a whole and its setting.
- 3.36** We have prepared a series of conservation area appraisals and management plans that assess and evaluate the character and appearance of each of our conservation areas and set out how we consider they can be preserved or enhanced. We will take these into account when assessing planning applications for development in conservation areas. We will seek to manage change in a way that retains the distinctive character and appearance of our conservation areas and will expect new development to contribute positively to this.
- 3.37** In relation to part 9, any development in or adjacent to archaeological priority areas is required to investigate and consider any archaeological interests in the area. The archaeology of the borough can best be protected if as much information as possible is available at the planning application stage. The evaluation - which may involve fieldwork - is needed so that we can assess the archaeological implications of proposals. Where appropriate, the evaluation may show how developments can be designed so that they do not harm a site of archaeological interest and/or how the remains will be preserved at the site, and where appropriate, preserve the archaeological findings at the site.
- 3.38** The Policies Map shows the location of the borough's heritage designations, including:
- world heritage sites;
  - statutory listed buildings;
  - conservation areas;
  - London squares;
  - registered parks and gardens;
  - scheduled monuments;
  - archaeological priority areas; and
  - strategic and local designated views

- 3.39** In addition to the above there are many non-designated buildings and sites of heritage significance within the borough which contribute to its distinctive character, such as unregistered parks and gardens, public houses, cemeteries and places of worship. Details of some of these assets are available in the Tower Hamlets Conservation Strategy, Conservation Area Character Appraisals and Management Guidelines and Local List. The Local List identifies locally important heritage assets which are of community value and contribute to the special character and distinctiveness of the borough.
- 3.40** The Tower Hamlets Conservation Strategy offers a positive strategy for the conservation and enjoyment of the borough's historic environment to ensure that it continues to be appreciated and enjoyed by current and future generations.
- 3.41** Where possible, we will seek to work with developers and other partners to secure creative solutions that would conserve heritage buildings, especially those at risk (as identified on the borough's heritage at risk register) and contribute positively to the character and vitality of the surrounding area.
- 3.42** We will consider using our legal powers to secure essential maintenance of designated heritage assets is undertaken, where necessary.

#### Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.H3: Housing standards and quality

#### Evidence links

- Tower Hamlets Conservation Strategy
- Heritage at Risk Register (Historic England)
- Planning (Listed Building and Conservation Area) Act 1990 (as amended)

- Tower Hamlets Local List
- Tower Hamlets Conservation Area Appraisals and Management Guidelines

## Policy D.DH4: Shaping and managing views

1. Development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. Development will be required to demonstrate how it:
  - a. complies with the requirements of the London View Management Framework and World Heritage Site Management Plans (Tower of London and Maritime Greenwich);
  - b. positively contributes to the skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf (as defined as the Policies Map);
  - c. preserves or enhances the prominence of the borough-designated landmarks and the skyline of strategic importance in the borough-designated views (as defined in figure 7);
  - d. preserves or enhances local views identified in conservation area appraisals and management guidelines;
  - e. preserves or enhances visual connection of the public realm with water spaces; and
  - f. enhances townscape and other local views which are important to the identity and character of the place.

### Explanation

**3.43** Views are important elements of townscape and local character, and provide a good test of the contribution that a development makes to a place. Townscape views can be valued for a variety of reasons, but often the most valued views will feature a prominent building that terminates a vista, acts a focal point or establishes some other form of spatial prominence. Such landmarks help to define and identify places and are considered to be a key component of high quality urban design (see figure 6). The policy identifies:

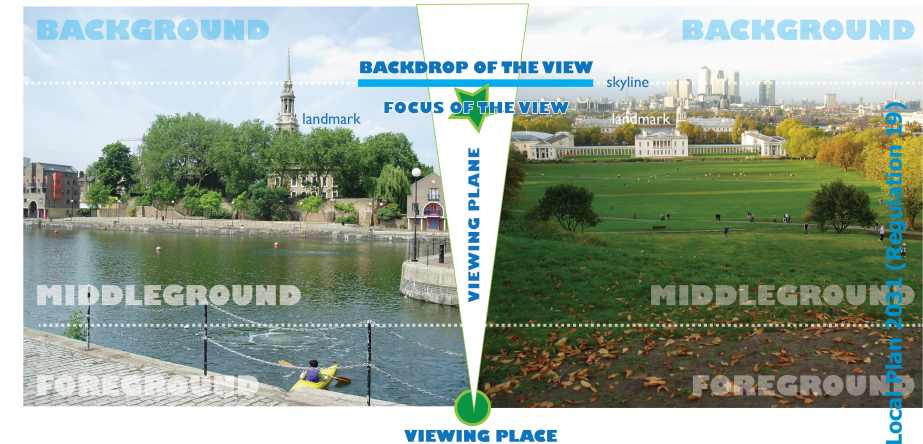
- a skyline of strategic importance which is observed from multiple locations within and outside the borough; and
- a series of views and landmarks of a borough-wide importance: borough-designated views and borough-designated landmarks.

**3.44** Part a refers to strategic views identified in the London Views Management Framework and Tower Hill and Greenwich Meantime World Heritage Site Management Plans which have impacts on developments within Tower Hamlets.

**3.45** Part b refers to the group of tall buildings around Canary Wharf that form a distinctive cluster, referred to as the “skyline of strategic importance”. This cluster is visible across London and has become a globally recognised silhouette. The distinctive skyline of the cluster is a prominent and recognisable feature in views from the surrounding areas, which are of a much smaller scale. The area of skyline of strategic importance covers the tall building zones in Canary Wharf: Canary Wharf Cluster and the Millwall Inner Dock Cluster, as shown on the Policies Map and set out in policy D.DH6. Building heights within the designation area should significantly drop towards its boundaries. The heights in the setting of the skyline of strategic importance should be consistent and significantly lower than the buildings at the edge of the designation area. Development should be tested in the views as per figure 7.

**3.46** Part c refers to borough designated landmarks - buildings of high architectural and cultural value that can be seen in views to and from a number of conservation areas. These views are referred to as borough designated views. Development should be tested against their impact on the prominence of borough designated landmarks in borough designated views as per figure 7.

Figure 6 :Views in context



Tower Hamlets Local Plan 2021 (Regulation 19)

- 3.47** Intrusive development (as defined in the glossary) that competes with the prominence of borough-designated landmarks in the backdrop of the borough-designated views or obscures them at the mid or foreground will be resisted.
- 3.48** Part d seeks to shape and manage the impact of development on views identified in the Conservation Area Character Appraisals and Management Guidelines covering each of the borough’s 58 conservation areas. Development that is harmful to the special character of these views will be resisted.
- 3.49** Part e recognises that water space is an intrinsic element of the borough’s identity and that its presence is an essential element of the character of a place.
- 3.50** Visual connections between public realm and waterfronts should be strengthened. Developments located directly at the waterfront and on streets in their direct vicinity which are parallel and perpendicular to their course, should afford views and glimpses of waterscape from the street level.
- 3.51** Part f seeks to shape and manage the impact that development would have on townscape and local views that are important to the identity of Tower Hamlets and its unique places. Due to relatively flat topography,

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tall buildings located in the borough can be seen from a number of remote locations. It is important that tall buildings positively contribute to the legibility, character and spatial structure of the borough's 24 places (see policy D.H6).

### Policy links

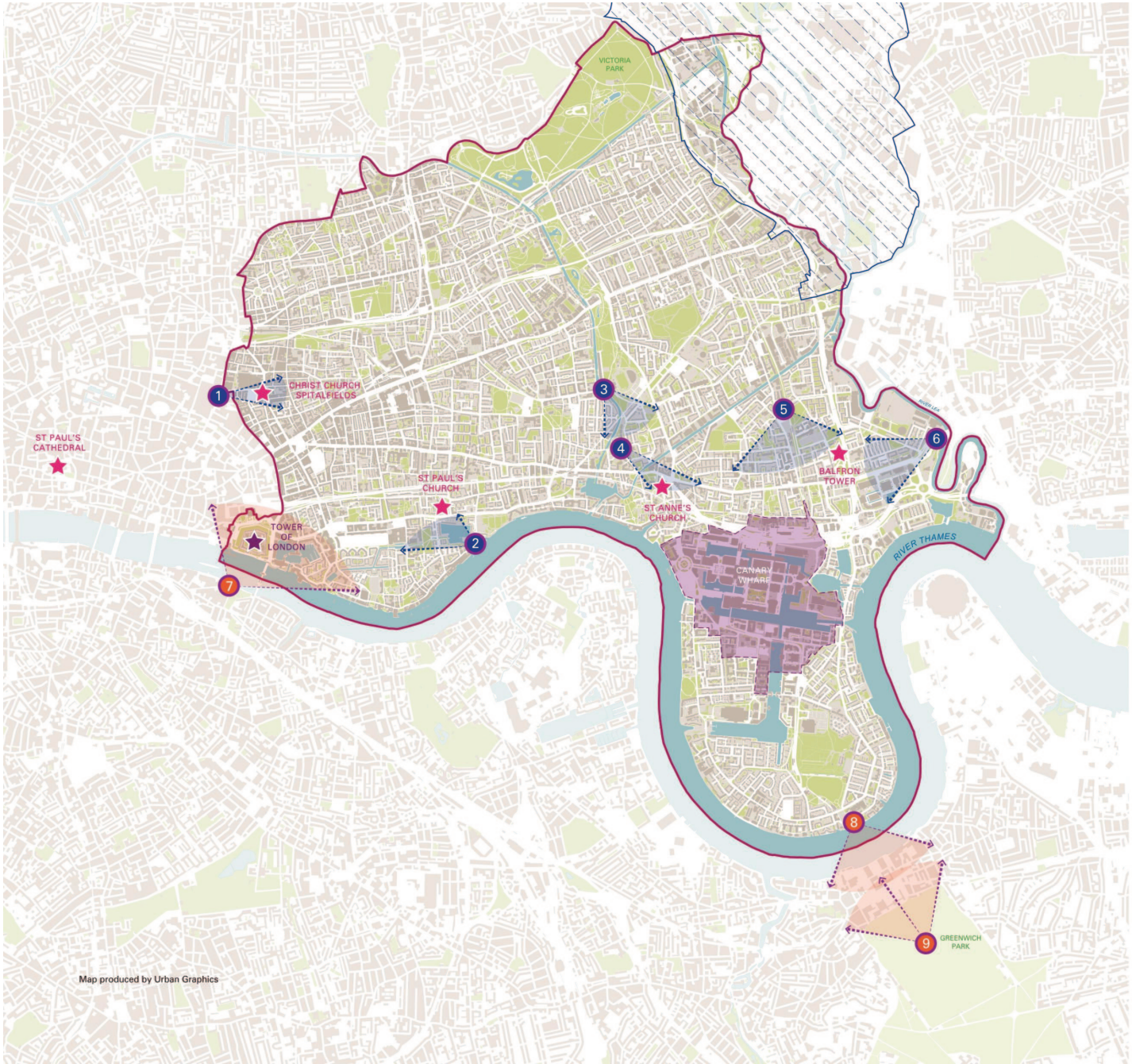
- Policy S.SG2: Delivering Sustainable growth in Tower Hamlets
- Policy S.OWS2: Enhancing the network of water spaces
- Policy D.OWS4: Water space

### Evidence links

- London View Management Framework (Mayor of London, 2012)
- Maritime Greenwich Site Management Plan
- Tower of London World Heritage Site Management Plan
- London Borough of Tower Hamlets: Conservation Area Appraisals and Management Guidelines
- Conservation Area Appraisal and Management Guidelines for Fish Island and White Post Lane Conservation Area (London Legacy Development Corporation)
- Tower Hamlets Tall Buildings Study



Figure 7 : Key views, landmarks and the skyline of strategic importance



- KEY**
- London Borough of Tower Hamlets boundary
  - Skyline of strategic importance
  - London Legacy Development Corporation
  - Open space
  - Water space
  - ★ Borough designated landmarks
  - ★ Tower of London: strategically important landmark
  - → Borough designated views
  - → London Views Management Framework & other key views (world heritage site views)
1. View from Spitalfields to Christ Church Spitalfields
  2. View from Wapping Wall bridge to St Paul's Church
  3. View from the bridge over Regent's Canal on Ben Johnson Road to St Anne's Church & Canary Wharf in the background
  4. View from Salmon Lane to St Anne's Church & Canary Wharf in the background
  5. View from Langdon Park to Balfour Tower & Canary Wharf in the background
  6. View from East India Dock Road to Balfour Tower & Canary Wharf in the background
  7. View from Queen's Walk to Tower of London world heritage site & Canary Wharf in the background
  8. View from Island Gardens to Greenwich world heritage site
  9. View from General Wolfe statue in Greenwich Park along the axis of Maritime Greenwich world heritage site to St Anne's Church with Canary Wharf in the backdrop

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## Policy S.DH5: World heritage sites

1. Development is required to ensure it safeguards and does not have a detrimental impact upon the outstanding universal value of the UNESCO world heritage sites: the Tower of London and Maritime Greenwich, including their settings and buffer zones (as shown on the Policies Map).
2. Proposals affecting the wider setting of the Tower of London and Maritime Greenwich or would impinge upon strategic or other significant views to or from these sites (particularly around Tower Hill and Aldgate and within the buffer zone around Island Gardens) will be required to demonstrate how they will conserve and enhance the outstanding universal value of the world heritage sites.
3. Development within the vicinity of the Tower of London is required to demonstrate how it will improve local pedestrian and cycle access routes, particularly signage and way-finding in the surrounding area.

### Explanation

- 3.52** World heritage sites are areas of cultural and national significance which include both natural features and man-made structures.
- 3.53** London has four world heritage sites, two of which are located within or next to the borough of Tower Hamlets on the banks of the River Thames: the Tower of London and Maritime Greenwich (as shown on figure 5: the key diagram).
- 3.54** The Tower of London, one of the UK’s most famous landmarks and tourist attractions, is a grade one listed castle and royal fortress, which acts as the gateway into the borough from the west. Indeed, the borough is named after the villages and hamlets around the Tower of London. However, many of the streets and spaces in and around this area are

dominated by vehicles/heavy traffic and offer a poor public realm and interchange experience from Tower Hill and Tower Gateway stations. These issues are also identified within the Tower of London World Heritage Site Management Plan.

**3.55** Maritime Greenwich lies immediately south of the borough and comprises an ensemble of buildings (including the Royal Palace, Royal Hospital and the Royal Observatory) set in landscaped parkland (part of the buffer area lies within the borough at Island Gardens on the Isle of Dogs, as shown on figure 7).

**3.56** This policy aims to ensure that new development safeguards and does not negatively impact on the ‘outstanding universal value’ of the Tower of London and Maritime Greenwich world heritage sites, including their attributes, settings and views to and from them. In this context, outstanding universal value is defined as *“areas of cultural and/or national significance so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity”*<sup>(15)</sup>.

**3.57** Proposals within close proximity to the Tower of London, or which have the potential to affect the setting and views of the Tower of London or Maritime Greenwich, will need to ensure they have regard to the Tower of London World Heritage Site Management Plan and/or the Maritime Greenwich World Heritage Site Management Plan.

**3.58** Potential opportunities exist to enhance the setting immediately around the Tower of London and reinforce the outstanding universal value of the site<sup>(16)</sup>

### Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy S.TR1: Sustainable travel

15 United Nations Education, Scientific and Cultural Organisation (UNESCO). Please note: attributes of the outstanding universal value are usually physical, but can also be processes or practices (such as traditions, or management regimes) that have an impact on physical qualities.

16 Tower of London Local Setting Study: An Assessment of the Local Setting of the Tower of London and Guidelines for its Management (Land Use Consultants, 2010)



**Evidence links**

- Historic England Heritage Protection Guide
- Tower of London World Heritage Site Management Plan
- London View Management Framework (Mayor of London, 2012)
- Maritime Greenwich World Heritage Site Management Plan
- Tower Hamlets Tall Buildings Study

**Policy D.DH6: Tall buildings**

1. Development with tall buildings are required to:
  - a. be of a height and scale, mass and volume that are proportionate to their role, function and importance of the location in the local, borough-wide and London context; and in keeping with the character of the immediate context and of their surroundings;
  - b. achieve exceptional architectural quality and innovative and sustainable building design, using robust and durable materials integrated at all angles of the building;
  - c. enhance the character and distinctiveness of an area without adversely affecting established valued townscapes and landscapes (including building/roof lines) or detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings;
  - d. provide a positive contribution to the skyline during both the day and night time;
  - e. not prejudice future development potential of adjacent/neighbouring buildings or plots;
  - f. maintain adequate distance between buildings to ensure a high quality ground floor experience and enhanced residential environment;
  - g. demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes;
  - 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;
  - i. provide high quality private and communal open space and play areas (where residential uses are proposed) which local residents can use and that encourage social cohesion;
  - j. demonstrate that the development does not adversely impact on the microclimate and amenity of the proposal site and the surrounding area;

- k. demonstrate that the development does not adversely impact on biodiversity and open spaces, including watercourses and water bodies and their hydrology; and
  - l. comply with Civil Aviation requirements and not interfere to an unacceptable degree with telecommunications, television and radio transmission networks.
2. Development of tall buildings will be directed towards designated Tall Building Zones (as shown on the Policies Map and figure 8) and must apply the following design principles.

Tall building zones	Principles
Aldgate	<ul style="list-style-type: none"> <li>• The background to the views of the Tower of London world heritage site from the Queen’s Walk at City Hall should be preserved. Tall buildings should actively increase the quality and extent of the public realm in this area.</li> <li>• Tall buildings should actively increase the quality and extent of the public realm in this area.</li> </ul>
Canary Wharf (Isle of Dogs)	<ul style="list-style-type: none"> <li>• Development within this location will be expected to safeguard the skyline and preserve the iconic image and character of Canary Wharf as a world financial and business centre. Individual buildings should be integrated into urban super blocks set in the public realm. Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square.</li> </ul>

	<ul style="list-style-type: none"> <li>• Individual buildings should be integrated into urban super blocks set in the public realm.</li> <li>• Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square.</li> </ul>
Millwall Inner Dock (Isle of Dogs)	<ul style="list-style-type: none"> <li>• Building heights in the Millwall Inner Dock cluster should drop away from the Canary Wharf cluster to support its central emphasis.</li> <li>• Building heights should step down away from the centre of the cluster and ensure that the integrity of the Canary Wharf cluster is retained on the skyline when seen from places and bridges along the River Thames across Greater London, particularly in views identified in the London Views Management Framework.</li> </ul>
Blackwall	<ul style="list-style-type: none"> <li>• Development heights should step down towards the edge of this zone. The cluster must be subservient and separate from the nearby Canary Wharf cluster and buildings should be of varying heights allowing sky views between them when viewed from the river or the Greenwich Peninsula.</li> <li>• The cluster must be subservient and separate from the nearby Canary wharf cluster and buildings should be of varying heights allowing sky views between them when viewed from the river or Greenwich Peninsula.</li> </ul>
Leamouth	<ul style="list-style-type: none"> <li>• Tall buildings in this cluster should step down towards the River Thames and ensure glimpses and views across the cluster.</li> </ul>



3. Development of tall buildings proposed outside of these zones must:

- a. significantly strengthen the legibility of a town centre or mark the location of transport interchange or other location of civic or visual significance within the area;
- b. provide sufficient distance from other landmark buildings or clusters to create a landmark in the townscape;
- c. unlock significant infrastructure constraints; and/or
- d. deliver significant additional publicly accessible open space.

### Explanation

**3.59** This policy seeks to guide and manage the location, scale and development of tall buildings in the borough. In recent years there has been a surge in the number of tall building developments in the borough, particularly within existing clusters at Aldgate, Isle of Dogs and other clusters emerging along the River Thames waterfront.

**3.60** Whilst tall buildings can positively contribute to the local environment and help to deliver growth in the local economy or much needed new homes, they can also cause harm to the character and identity of an area, either individually or cumulatively.

**3.61** Tall buildings can significantly impact the quality and safety of the public realm (for example, through blank facades and a poor street interface or through generating adverse micro-climatic conditions, such as wind funnelling). They may cause overshadowing or solar glare and undermine the quality and value of adjacent developments. In low-or-medium rise residential neighbourhoods, tall buildings can feel overbearing and have a negative impact on amenity and views.

**3.62** Beyond the Central Activities Zone and Tower Hamlets Activity Areas, as defined on the Policies Map, the borough is largely residential in nature and includes a relatively high proportion of medium to low rise buildings.

**3.63** In this context, it is important that tall building developments are carefully designed and steered towards locations that positively respond to the context and character of the surrounding area, including the borough's 24 places.

**3.64** For the purposes of this policy, a tall building is classified as 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 height of surrounding buildings (whichever is less) will be considered to be a tall building.

**3.65** Part 1 of the policy sets out the criteria against which all development involving tall buildings will be assessed. The criteria will guide the visual and contextual development of tall buildings in the borough. In order to enable assessment against the criteria, we will require an accurate visual representation to be submitted alongside the design and access statement as part of the planning application. This model should show the proposal in near, middle and distant views, including the public realm and its appearance at street level. It should include a 360-degree view analysis and a study of relative heights of buildings in the surrounding area. An architectural model may be required depending on the scale and nature of the proposal.

**3.66** Proposals involving tall buildings will need to demonstrate how any adverse impacts on the microclimate will be mitigated in relation to wind, overshadowing, day lighting, solar glare, light pollution, privacy and sense of ownership. 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. The testing of the following scenarios will be required as part of the planning application.

- Baseline (i.e. the situation at the time of submission).
- The proposed development without mitigation/landscaping.
- The development with surrounding cumulative developments without mitigation/landscaping.
- The development with the inclusion of mitigation/landscaping.
- The development with surrounding cumulative developments with the inclusion of mitigation/landscaping.

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- Specific details on the required mitigation measures must be provided, including where and how these measures will be implemented.
- It is essential that any required mitigation measures are tested as part of the application. This is to ensure that the mitigation is adequate, and can therefore be relied upon. The mitigation must be implemented prior to occupation of any part of the development and retained for the duration of the development.

**3.67** Proposals involving tall buildings (90 metres in height or greater) must be referred to the Civil Aviation Authority and London City Airport to ensure they will not be a potential hazard to aviation safety and navigation, in view of the proximity to London City Airport.

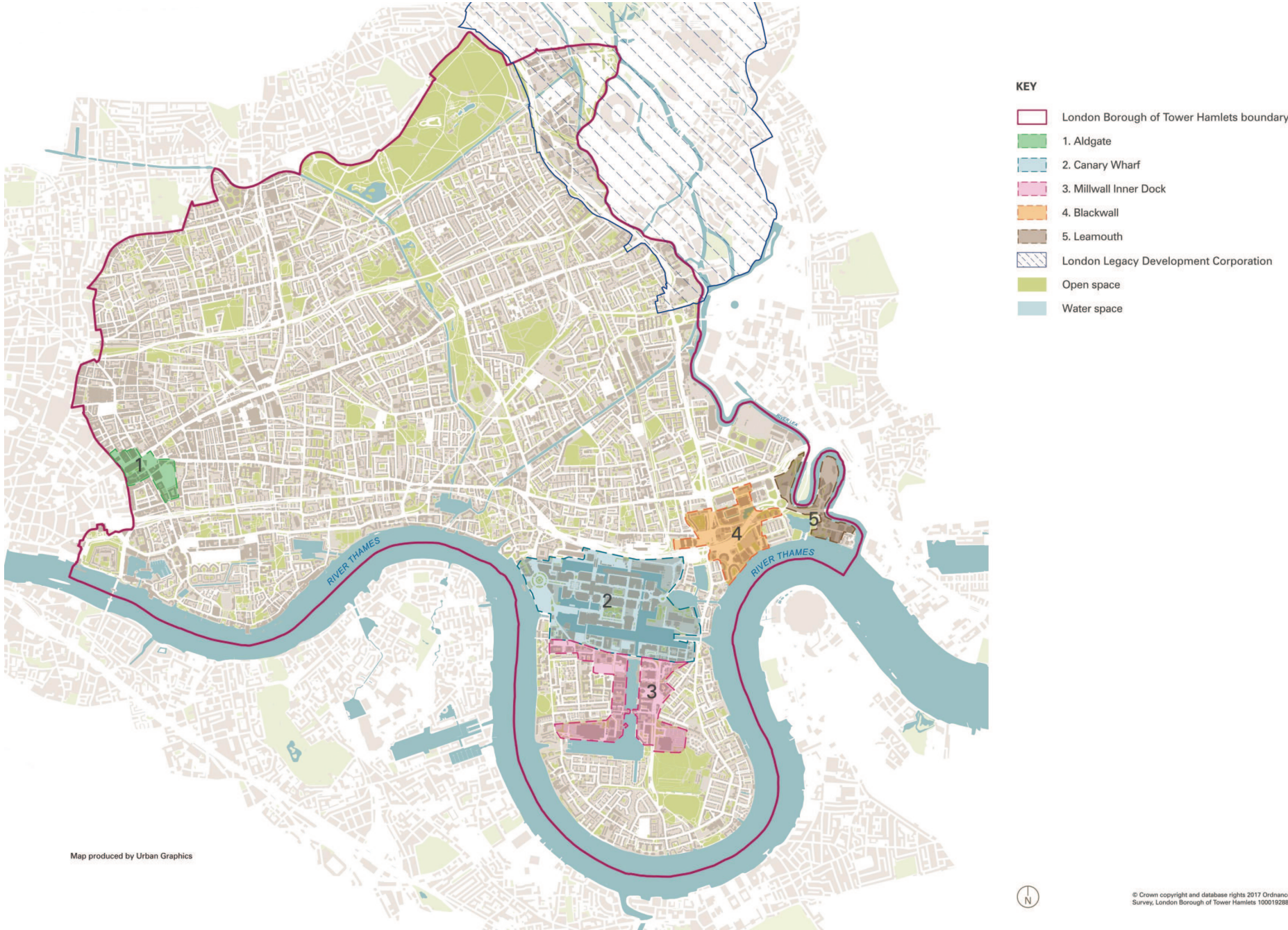
**3.68** The criteria set out in part 1 above also applies to the redevelopment of existing tall buildings (including those outside the tall building zones). The presence of an existing tall building on the site will not in itself be regarded as justification for replacing it with another tall building or the commencement of a tall building cluster or zone.

**3.69** Part 2 identifies a series of tall building zones (as shown on the Policies Map and figure 8) to make it clear where tall buildings will be directed. The location of these zones has been derived from a thorough analysis of the character of the borough.

**3.70** The Tall Buildings Study should be read alongside this policy and provides detailed guidance on the potential location, design and height of tall buildings in the borough.

**3.71** Each tall building zone is different and tall buildings proposed within the zones will need to respect the existing character of the area and respond to sensitivities. Tall building development within the zones may require land assembly as not every individual plot within these zones is large enough to meet requirements set out in part 2 above.

Figure 8 : Tall building zones

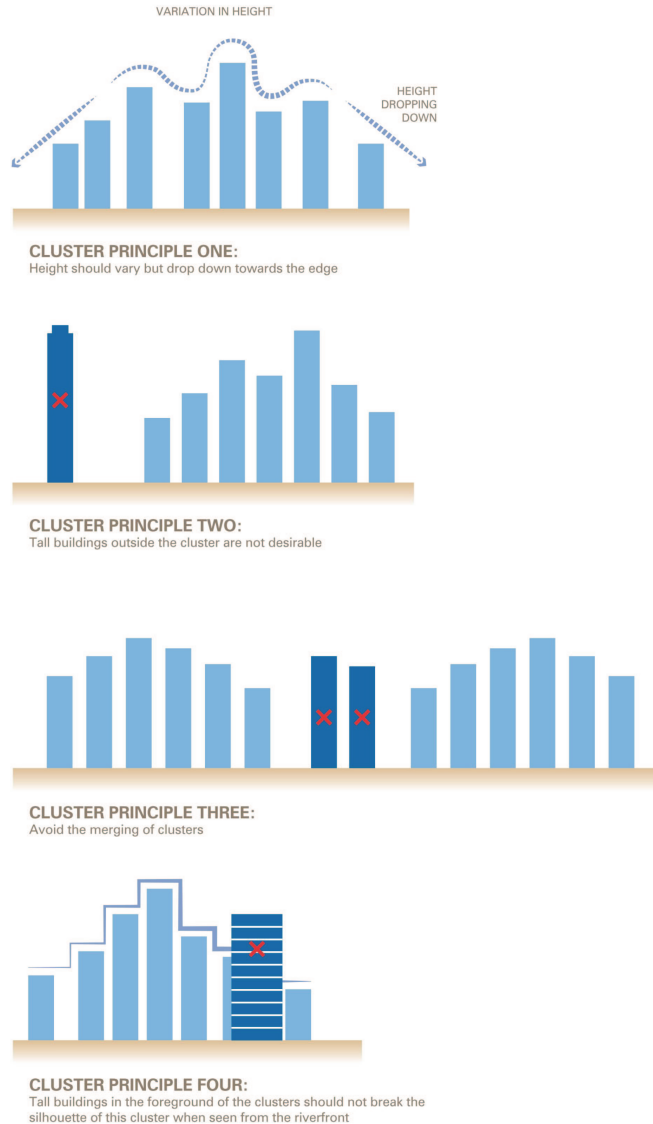


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Figure 9 : Principles of tall building clusters



**3.72** Within tall building zones (as shown on figure 8), clusters of tall buildings may be developed. The height of tall buildings within a cluster should reflect the role and function of the cluster and normally the tallest elements should be located towards the centre of the cluster, which should mark a particular feature or location (e.g. One Canada Square, Canary Wharf). Developments involving tall buildings will be required to step down towards the edge of the tall building zone (see figure 9). It does not follow, however, that all buildings within a tall buildings zone will be tall in height/scale and variations in height will be encouraged to create a more dynamic skyline.

**3.73** The Tall Buildings Study identifies other potentially suitable locations outside of the tall building zones where tall buildings might be appropriate, depending on the nature of the proposals and where sensitive receptors have been addressed. However, tall buildings will generally not be supported in sensitive locations (e.g. conservation areas) and established low rise residential areas.

**3.74** In relation to part 3 (b-c), tall building proposals outside of the zones will be subject to additional criteria to ensure they do not have an adverse impact on the setting or character of the borough. In such locations, tall buildings will be expected to serve as landmarks and unlock significant infrastructure provision (in particular the provision of publically accessible open space and social and community facilities) to address deficiencies within the area (as identified in the Infrastructure Delivery Plan, the Regulation 123 List and other relevant strategies) and address the requirements set out in section 4. The height of these buildings should relate to their role as a local, district or metropolitan landmark and the context height (as categorised in the Tall Buildings Study). In addition, proposals should ensure that there is adequate distance between the proposed and existing tall buildings in the area to ascertain their landmark status.

**3.75** Where possible, we will seek to work with developers, landowners, statutory agencies and neighbourhoods to develop masterplans to guide the scale and location of tall buildings, taking account of their wider and cumulative impacts, in line with the requirements set out above.

**Policy links**

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG4: Construction of new development
- Policy D.H3: Housing standards and quality
- Policy S.CF1: Supporting community facilities
- Policy S.OWS1: Creating a network of open spaces
- Policy D.OWS4: Water space
- Policy D.ES3: Urban greening and biodiversity

**Evidence links**

- Tower Hamlets Tall Buildings Study
- Tall Buildings: Historic England Advice Note 4 (Historic England, 2015)
- Guidance on Tall Buildings (Commission for Architecture and the Built Environment and English Heritage, 2007)
- Community Infrastructure Levy Regulation 123 List

**Policy D.DH7: Density**

1. Residential development should be consistent with the guidelines set out in the London Plan. Where higher density development is proposed, it must demonstrate that:
  - a. the cumulative impacts of the proposed development have been considered and do not result in over-development or that suitable mitigation measures in relation to design and infrastructure have been identified; and
  - b. the site does not compromise the development potential of neighbouring sites.

**Explanation**

- 3.76** Many proposed developments in the borough are seeking to exceed the highest density levels set out in the London Plan's density range. While, in principle, this is allowed as an exception as part of the London Plan's policies, in some parts of the borough, exceptional densities are coming forward in great numbers and concentrated in certain areas, such as South Quay and parts of the City Fringe Central Activities Zone.
- 3.77** Exceptional densities in the borough should not be the norm but should remain as exceptions. In order to manage this, the policy requires that developments in excess of the London Plan density range should consider the cumulative effects from development and should not result in over-development of the site or impact on the development potential of neighbouring sites.
- 3.78** For the purposes of this policy, over-development refers to a quantum of development that is excessive in terms of demand on infrastructure and services, or impact on local amenity and character.
- 3.79** Where the London Plan density ranges are exceeded, schemes must be of exemplary design quality and must address the issues that can be associated with high density development, such as noise, disturbance and overlooking. In addition, developers should consider the capacity

of infrastructure and services to accommodate the development, including potential mitigation measures to unlock any identified constraints.

**3.80** Where residential density guidelines are applied to mixed-use developments, the density figures should be based on the net residential area. Developers are expected to include in their planning application the relevant London Plan density range for their site and the actual net residential density proposed.

**3.81** Tall and dense developments are also required to consider the criteria set out in policy D.DH6.

### Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- 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.ES9: Noise and vibration
- Policy D.TR2: Impacts on the transport network

### Evidence links

Mayor of London Housing Supplementary Planning Guidance (GLA, 2016)

### Policy D.DH8: Amenity

1. Development is required to protect and where possible enhance or increase the extent of the amenity of new and existing buildings and their occupants, as well as the amenity of the surrounding public realm. To achieve this, 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; and
  - e. not create unacceptable levels of artificial light, odour, noise, fume or dust pollution during the construction and life of the development.

### Explanation

**3.82** This policy seeks to ensure developments are well designed (both internally and externally) and enable residents and occupants to enjoy a good level of amenity and natural surveillance.

**3.83** For the purposes of this policy, a habitable room is defined as a room within a dwelling, the primary use of which is for living, sleeping or dining. This definition includes living rooms, dining rooms, bedrooms, studies, home offices and conservatories but excludes halls, corridors, bathrooms and lavatories. Kitchens which provide space for dining and have windows will be considered habitable rooms and should be included in the assessment of amenity impacts.

- 3.84** Applicants or developers will need to give careful consideration to the layout and massing of buildings to ensure that the new development does not result in an increased sense of enclosure and loss of outlook. Single aspect dwellings should be avoided. If dwellings overlook bin stores, screening and landscaping should be used to limit the impact.
- 3.85** Part a of the policy seeks to ensure there is sufficient privacy and no unreasonable loss of amenity from overlooking between habitable rooms of adjacent residential properties, or onto schools and other community facilities (e.g. health centres) or private open spaces. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. However, a distance of approximately 18 metres between windows of habitable rooms reduces inter-visibility to a degree acceptable to most people. This figure will be applied as a guideline depending upon the design and layout of the development.
- 3.86** For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden (see part b).
- 3.87** Part c seeks to ensure that the design of new development optimises the levels of daylight and sunlight. Part d seeks to ensure that new developments minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing (including on amenity space and public open space).
- 3.88** A sunlight and daylight assessment must accompany all major planning applications and/or smaller schemes where adverse effects on daylight and sunlight levels are anticipated. It should follow the methodology set out in the most recent version of Building Research Establishment's "site layout planning for daylight and sunlight" guidance and the British Standard Code of Practice for daylighting, the results of which must be submitted with the planning application. Daylight and sunlight assessments should also include consideration of the potential redevelopment of adjacent sites, so as not to prejudice their redevelopment (see part d).
- 3.89** Part e seeks to ensure that artificial lighting is well-designed and uses appropriate light levels to avoid interference with someone's use of their property and reflects the street hierarchy. Badly designed lighting schemes can be damaging to the environment and result in visual nuisance to residents.
- 3.90** For the purposes of this policy, light pollution is defined as the adverse effect of artificial lighting and includes glare, light spillage and sky glow.
- 3.91** Odour and fumes from commercial development can also have an adverse impact on the amenity of surrounding residents. Best practice guidance should be followed: development should refer to the most recent version of the government's guidance on the control of odour and noise from commercial kitchen exhaust systems.
- 3.92** Noise and dust pollution can often be a particular problem during the construction phase of the development. Where necessary, we will use planning conditions requiring construction management plans to demonstrate that noise and dust pollution can be satisfactorily managed and/or mitigated along with any adverse impacts on the highway network.

#### Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG4: Construction of new development
- Policy D.H3: Housing standards and quality
- Policy D.H4: Specialist housing
- Policy D.H7: Housing with shared facilities ('houses in multiple occupation')
- Policy D.TC5: Food, drink, entertainment and the night-time economy
- Policy D.ES9: Noise and vibration
- Policy D.ES10: Overheating
- Policy D.MW2: New and enhanced waste facilities
- Policy D.MW3: Waste collection facilities in new development

## Evidence links

- Site layout planning for daylight and sunlight: a guide to good practice (BRE, 2012)
- Control of odour and noise from commercial kitchen exhaust systems (Department for Environment, Food and Rural Affairs, 2011)

## Policy D.DH9: Shopfronts

1. New or replacement shopfronts are required to be robust and well-designed and ensure:
  - a. the maintenance of active shopfronts at all times;
  - b. a sensitive relationship between the shopfront and the upper floors;
  - c. a sensitive relationship with surrounding shopfronts and buildings;
  - d. the use of materials which are appropriate to and enhance the local character and value existing architectural and historic features; and
  - e. the provision of sensitive signage location and design, which is not overly dominant to the shopfronts and the buildings.
2. Shopfront fascias should not extend above ground floor level.

## Explanation

- 3.93** This policy seeks to ensure that shopfronts are attractive, well designed and make a positive contribution to the surrounding streets, spaces and public realm and thereby enhance the overall character and appearance of the borough.
- 3.94** Shopfront design should be an integral part of the design process with consideration given to how security measures are incorporated. These should include the use of security glass and internal retractable grills rather than the use of closed external roller shutters which result in unwelcoming environments.
- 3.95** Shopfronts should incorporate a well-defined frame, stall-riser, door and window units which sit in a defined architectural surround, use appropriate high quality materials and be of a scale which relates to the upper floors of the building and complements the quality and character of surrounding buildings.



- 3.96** Achieving a sensitive relationship between the shopfront and its surroundings means for instance: shopfront fascias should be within the width of a single building and should not extend above the first floor or obscure architectural features of value.
- 3.97** Shopfronts which form part of a group of original shopfronts and/or are designated heritage assets should be of a traditional design and incorporate traditional features, character and use traditional materials. Development should avoid the use of neon lighting, animated electronic displays and external solid shutters.

#### Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.TC3: Retail outside our town centres

#### Evidence links

- Shopfronts and Roller Shutter Grilles (London Borough of Tower Hamlets)

#### Policy D.DH10: Advertisements, hoardings and signage

- Advertisements, hoardings and signage must be well-designed and well-integrated within the public realm, host buildings and the surrounding area. In particular, proposals will be supported where they demonstrate how they:
  - complement the character, appearance and visual amenity of the site and the surrounding area;
  - do not have an adverse impact on the setting or significance of heritage assets (including conservation areas and listed buildings) and do not obscure architectural features;
  - do not intrude into the outlook of nearby residents;
  - do not adversely affect public or highway safety or impede pedestrian access, including for those with visual impairment or impaired mobility;
  - enhance the visual amenity of construction sites and vacant or underused sites/buildings and the surrounding area, including through the use of appropriate lighting;
  - are subservient in relation to the streetscape or the buildings to which they are attached; and
  - do not create or contribute to a proliferation of signs and advertisements which cause 'visual clutter' in the streetscape.
- Within conservation areas, advertisements, signage and hoardings need to complement the special character of the area and:
  - will not be supported above fascia or ground level;
  - should be externally illuminated; and
  - projecting or hanging signs will be restricted to one per frontage.

#### Explanation

- 3.98** This policy aims to ensure advertisements, hoardings and signage positively activate the streetscape and enhance the visual appearance of their host buildings or structures.

**3.99** Part 1 provides guidance on the appropriate design and settings of advertisements, hoardings and signage (including fascia and hanging shop signs, A-boards, poster panels, digital billboards and free-standing advertisements).

**3.100** We recognise that well-designed features in the streetscape can make a positive contribution to the public realm and play an important role in providing local information and supporting local businesses. However, poorly designed, excessive or overly dominant features can have negative impacts on the character and appearance of their surroundings and can create hazards for pedestrians and traffic.

**3.101** Advertisements, hoardings and signage should be in keeping with the character of the area and should not negatively affect the amenity of surrounding properties or highway/public safety. There is a particular need to avoid physical and visual clutter in the streetscape as well as problems arising from distraction among road and pedestrian users. For instance, the location of A boards in areas where the width of the footway is less than 2 metres will be resisted. Poster panels/freestanding adverts will generally be out of place within residential areas due to their scale, size and intrusive nature. External illumination for signage will need to be carefully considered at an early stage in the design process to ensure that lighting can be sensitively incorporated, where required.

**3.102** Provision of public artwork or other visual concepts on hoardings will be supported and encouraged, where it can enhance the local streetscape and improve the appearance of construction sites.

**3.103** Part 2 provides guidelines for advertisements, signage and hoardings in conservation areas. The design should complement the historic character of the conservation area in terms of scale, location, composition and materials applied. Any lighting associated with advertisements, signage or hoardings should be discreet and well placed so that it does not interfere with the visual amenity of the historic environment. External lighting should generally be used rather than internal illumination, due to the potential impact on heritage assets.

### Policy links

- Policy SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG4: Construction of new development
- Policy S.TR1: Sustainable travel

### Evidence links

- Signs and Advertisements (London Borough of Tower Hamlets)
- Town and Country Planning (Control of Advertisements) (England) Regulations

**Policy D.DH11: Telecommunications**

1. The installation of new telecommunication apparatus is required to minimise its impact on the street scene and not unacceptably harm the appearance of heritage assets through appropriate design and:
  - a. demonstrate that where a new site is proposed that co-location/mast-sharing on existing sites has been explored and is not possible;
  - b. not create any unacceptable risks to the health and well-being of residents and users of surrounding and nearby sites; and
  - c. not unacceptably detract from the amenity of surrounding properties.

**Explanation**

**3.104** This policy aims to ensure that the design and location of telecommunications equipment does not create a safety hazard or detract from the character of their surroundings, taking into consideration the potential impacts on the amenity of the area and local residents.

**3.105** Proposals to install new telecommunications equipment will be required to submit a written report alongside the planning application demonstrating that similar/compatible equipment has been identified and clearly set out that all reasonable efforts to co-locate have been explored and are not possible, due to incompatibility of equipment.

**3.106** Details should also be included on the frequency modulation, power output and evidence of how the proposal meets the International Commission on Non-Ionising Radiation Protection to demonstrate compatibility with surrounding uses.

**Policy links:**

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets

- Policy D.SG3: Health impact assessments
- Policy D.ES9: Noise and vibration

**Evidence links**

- Guidance Shopfronts and Roller Shutter Grilles (Tower Hamlets)

## Chapter 4: Meeting housing needs

### Introduction

- 4.1** This chapter sets out the policies to maximise the supply of housing in the borough to meet both local and strategic needs.
- 4.2** The London Plan (GLA, 2016) identifies a ten-year minimum housing supply target of 39,314 homes within Tower Hamlets over the period 2015-2025. This is equivalent to a minimum requirement of 3,931 homes per annum. The London Plan does not set out specific housing targets beyond 2025 but expects boroughs to 'roll forward' their annual target. The London Plan ten-year target, plus the annual rolled forward target, results in a housing supply target for the borough (2016 – 2031) of 58,965 homes.
- 4.3** This target is greater than our objectively assessed need of 46,458 homes<sup>(17)</sup>, reflecting the fact that the borough is expected to significantly contribute towards meeting London's strategic housing need. Appendix 7 sets out a summary of the expected housing supply over the plan period.
- 4.4** Tower Hamlets also needs to provide at least 21,100 new affordable homes over the same period to meet its future needs, equivalent to an average of 1,407 dwellings per year (45% of the overall need).
- 4.5** The delivery and implementation section sets out the strategy on how we are planning to meet both local housing needs and strategic housing needs over the plan period (see section 5).
- 4.6** The figures in the table below are based on the estimated capacity of the site allocations (further detail on these figures is set out in appendix 7).

Table 1 Minimum number of additional homes across sub-areas (2016 - 2031)

Sub area	Minimum number of additional homes	Percentages
Isle of Dogs & South Poplar	29,848	56%
City Fringe	9,330	19%
Lower Lea Valley	5,395	11%
Central Area	6,671	14%
Windfall allowance (evenly distributed between sub areas)	3,010	
Tower Hamlets: total	54,455	100%

- 4.7** In line with policy S.SG1 of the Local Plan, the majority of the housing growth within the borough will be provided in the following locations (see figure 10<sup>(18)</sup>).
- Isle of Dogs and South Poplar sub-area: the places of Canary Wharf, Blackwall, Leamouth and northern parts of Millwall and Cubitt Town.
  - City Fringe sub-area: the places of Whitechapel, Wapping and Aldgate.
  - Lower Lea Valley sub-area: the places of Poplar Riverside and Poplar.
- 4.8** While there will be a shortfall towards the end of the plan period, we are committed to working with our partners (including the Greater London Authority) to maximise housing supply within the parameters of sustainable development and address this unmet need<sup>(19)</sup>.
- 4.9** In addition, we anticipate that through normal plan delivery over the plan period, sufficient additional units can be delivered to meet the London Plan target. This is due to factors relating to uncertainties and

17 This is identified in the Tower Hamlets Strategic Housing Market Assessment.

18 Please note: the distribution of housing growth is based around ward boundaries.

19 Our approach in this regard is outlined in the Tower Hamlets Housing Delivery Strategy (see also paragraph 4.14 and section 5).

assumptions in the housing supply which have not been factored into the trajectory (see appendix 7) and are anticipated to accelerate the delivery of new homes over the plan period. This includes higher-than-average density levels and delivery rates (due to the extent of development interest in the borough) and the emergence of new delivery mechanisms (e.g. new council-led housing companies and the GLA-funded housing zone within Poplar Riverside) and other interventions (e.g. brownfield register).

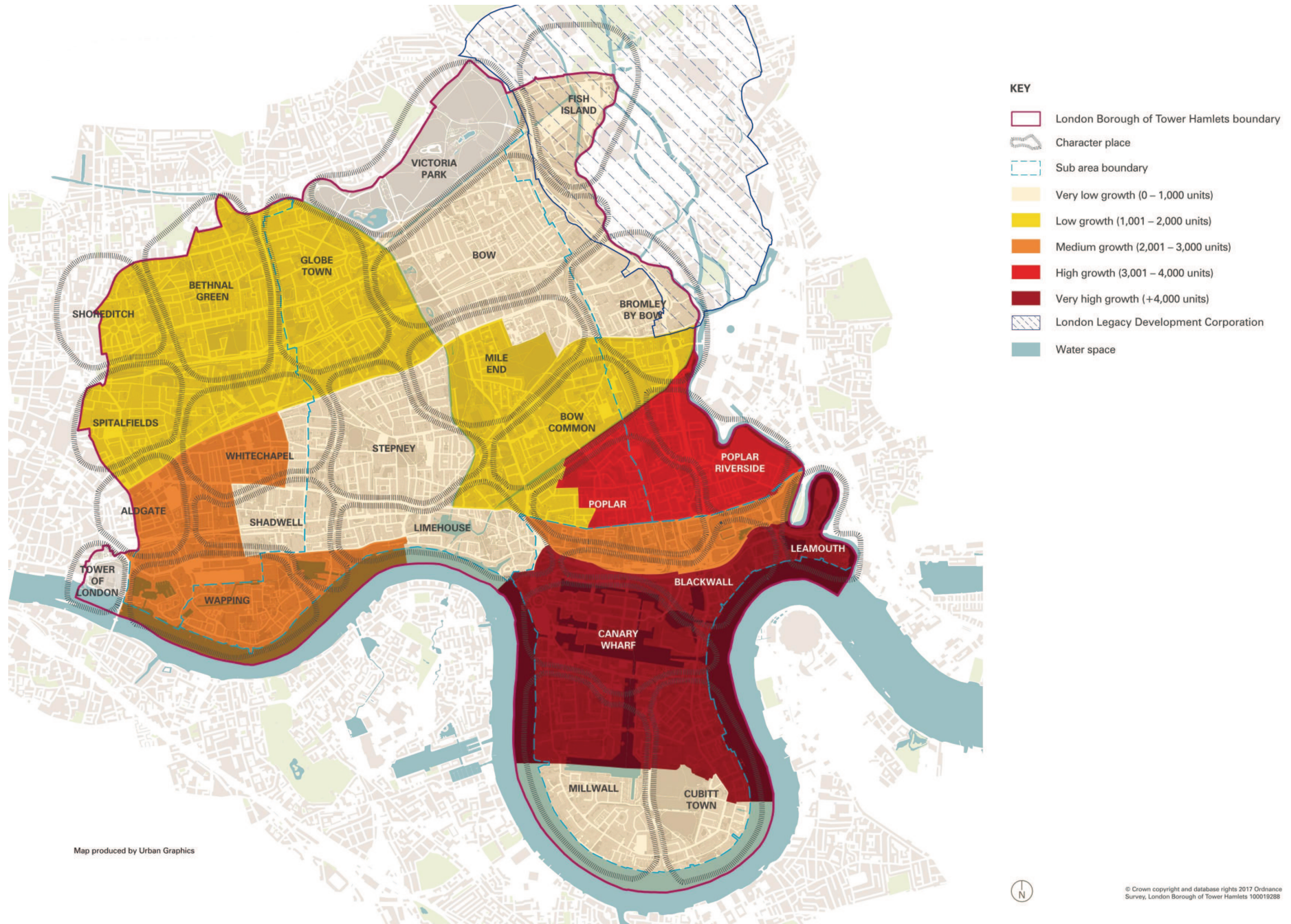
**4.10** If our targets are not being met, we will undertake a review of the Local Plan to explore ways of addressing this unmet need, taking into account the outcomes of future revisions to the London Plan and opportunities to increase the supply as detailed below<sup>(20)</sup>.

**4.11** This section contains the following policies.

- Policy S.H1: Meeting housing needs
- Policy D.H2: Affordable Housing
- Policy D.H3: Housing standards and quality
- Policy D.H4: Specialist housing
- Policy D.H5: Gypsies and travellers accommodation
- Policy D.H6: Student housing
- Policy D.H7: Housing with shared facilities ('houses in multiple occupation')



Figure 10 : Housing distribution across 24 places



Map produced by Urban Graphics

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**Policy S.H1: Meeting housing needs**

1. We will secure the delivery of at least 58,965 new homes across the borough (equating to at least 3,931 new homes per year) between 2016 and 2031. This will be achieved through:
  - a. focusing the majority of new housing in the opportunity areas and site allocations (as shown on the Policies Map);
  - b. ensuring development does not undermine the supply of self-contained housing - in particular family homes;
  - c. resisting development that would result in a net loss of residential floorspace or family units;
  - d. housing estate regeneration schemes delivering homes which meet housing need and provide improved social facilities and environmental amenity; and
  - e. working to return vacant homes back to use.
  
2. Development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through:
  - a. setting an overall target for 50% of all new homes to be affordable, to be achieved through:
    - i. securing affordable homes from a range of council-led initiatives;
    - ii. requiring the provision of affordable housing contributions on sites providing 2 to 10 new residential units against a sliding-scale target (subject to viability);
    - iii. requiring the provision of a minimum of 35% affordable housing on sites providing 11 or more new residential units (subject to viability); and
    - iv. requiring a mix of rented and intermediate affordable tenures to meet the full range of housing needs.
  - b. requiring a mix of unit sizes and tenures to meet local need on all sites providing new housing;

- c. supporting a variety of housing products in the market and affordable tenures which meet local need; and
  - d. complying with our duty to support local demand for self-build.
  
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; and
  - d. gypsies and travellers, through safeguarding the existing gypsy and traveller site at Old Willow Close and seeking to deliver additional safeguarded pitches adjacent to the site, following the completion of the Elizabeth line.
  
5. Residential development should encourage increased housing sales to Londoners, preferably for owner-occupation.

**Explanation**

**4.12** This policy sets out the strategic housing supply requirements for Tower Hamlets as well as our objectives of ensuring the creation of mixed and balanced communities, sustainable places and quality living environments within the borough.

**4.13** The borough's housing supply target relates to total net housing supply. The strategic target is composed of the housing supply target of at least 39,310 new homes between 2015 and 2025 - established in the London Plan (GLA, 2016) - and a rolled-forward target of at least 3,931 new homes per year between 2026 and 2031. The target includes self-contained residential units and non-self-contained residential



accommodation, including specialist housing for students and older people in use classes C2, C3 and C4 or sui generis, as identified in annex 4 of the London Plan (GLA, 2016).

**4.14** Housing growth will be primarily delivered in the locations specified in part 1 (a)<sup>(21)</sup> via a number of different mechanisms: the regeneration of previously developed land, intensification of the built form in opportunity areas and the delivery of site allocations. A smaller proportion of housing will be delivered through town centre intensification, estate regeneration and infill development, bringing back long term vacant properties into residential use and windfall sites. Further details can be found in sections 4 and 5<sup>(22)</sup>.

**4.15** Part 1 (b) seeks to protect existing and safeguard the future supply of self-contained housing. This is to ensure we meet identified local need as well as strategic targets for housing. Development for non-self-contained units will not be supported where it utilises land identified for self-contained housing through a current planning permission, or through the borough's development plan. It is recognised that other policies in this plan identify suitable locations for other land uses. Developments of other land uses, where supported by policy and/or site allocations, are not considered to undermine the supply of self-contained units. Family housing requires particular protection, due to high levels of identified need<sup>(23)</sup>.

**4.16** Part 1 (c and d) will be implemented through partnership working to realise local need as well as strategic targets. Estate regeneration schemes are expected to protect and enhance the estate's physical environment and community assets, as well as deliver at least like-for-like replacement of unit size and tenure mix. Linked policy D.H2 (part 5) provides further detail on delivering this requirement. The Tower Hamlets

Housing Strategy (2016-2020) and the Good Practice Guide to Estate Regeneration (GLA, 2016) provide further guidance. Policy D.H2 (part 5) provides further detail on delivering this requirement.

**4.17** Vacant units brought back into residential use also contribute towards meeting the housing supply figure. We undertake a range of activities to bring vacant buildings back into use, such as grants and buy-back of ex-council stock.

**4.18** Part 2 sets a target of achieving 50% affordable homes through private development as well as council-led initiatives. This target is considered to best reflect local housing need<sup>(24)</sup>. On developments that yield 11 or more net additional residential units, at least 35% affordable housing is expected. Developments are expected to maximise the provision of affordable housing, having regard to availability of public subsidy, implications of phased development (including provision for re-appraising scheme viability at different stages of development) as well as financial viability which should, in particular, take account of prevailing local and regional viability guidance. Applicants are strongly encouraged to meet or exceed the delivery of 35% affordable housing. Lower levels will only be accepted in exceptional circumstances where robustly justified through viability evidence and where it is demonstrated that there are clear barriers to delivery. Applications that do not meet policy requirements will be subject to viability re-appraisals.

**4.19** Affordable housing calculations will be made using habitable rooms. Given the extent of local need, it is considered necessary and appropriate to seek financial contributions towards the provision of affordable housing from sites of less than 10 units. Financial contributions will be calculated using our preferred methodology as set out in the Planning Obligations Supplementary Planning Document. Over the plan period, developments on small sites have the potential to contribute over 3,000 new homes and could make a significant contribution towards meeting local

21 Opportunity areas are designated in the London Plan (GLA, 2016) and are considered to be London's main opportunities for accommodating large-scale new development to provide substantial numbers of new employment and housing, due to transport connectivity, land availability and deliverability. Site allocations are sites in the borough which have been identified as able to accommodate new homes and jobs alongside necessary infrastructure such as open space, health and education facilities. Further information about opportunity areas and site allocations is provided in policy S.SG.1.

22 The Housing Delivery Strategy sets out our approach to managing housing delivery across the borough to 2031 and supporting the delivery of the housing target set out in this plan.

23 Tower Hamlets Strategic Housing Market Assessment

24 This need is established in the Tower Hamlets Strategic Housing Market Assessment (2014 and 2017).



affordable housing need (see appendix 7). Financial contributions will be calculated using a sliding-scale target starting at 3.5% across the whole site and increasing to 3.5% for each additional home, reaching 35% for sites of 11 units or more. Further detail (including on financial viability assessments) is provided in the developer contributions policy (D.SG5) and in the latest Planning Obligations Supplementary Planning Document.

- 4.20** Part 2 (b) expects that all housing developments will contribute to delivering mixed and balanced communities. Private student and specialist housing will be required to deliver a mix of affordable and market units of the relevant typology on site in order to meet a wide range of needs. All other housing development will be required to deliver a mix of housing tenures and sizes on site.
- 4.21** Part 2 (d) seeks to support a range of innovative housing products such as 'build-to-rent' private rented housing. Housing products will be supported where they are compatible with optimising the use of land and facilitate the delivery of housing to meet needs in each tenure. All residential developments must meet the requirements outlined in policies D.H2 and D.H3, including unit size mix, affordable housing and space standards. In addressing these requirements, consideration will be given to the size of the development. We also support the delivery of residential moorings in suitable locations (further guidance is provided in policy D.OWS2).
- 4.22** Part 2 (e) demonstrates our commitment to supporting those who wish to build their own home. The current self-build register indicates there is interest in self-build in the borough, however high local land values and housing targets are resulting in the predominance of flatted developments which limits opportunities for viable self-build. Group self-build has the best potential to deliver significant additional housing

output in higher cost areas, like Tower Hamlets<sup>(25)</sup>. We would therefore encourage group self-build as a more viable model of self-build in the borough. Our housing service is working with interested local self-builders to consider a range of options to support self-builders overcome challenges to delivery in the borough.

- 4.23** Part 3 requires development proposals to appropriately respond to the character of the surrounding area and site-specific constraints, as well as provide a high quality living environment in line with the Home Quality Mark standards<sup>(26)</sup>. Further guidance is provided in chapter 2.
- 4.24** Part 4 recognises our duty to provide specialist and supported housing for students, gypsies and travellers and homeless, disabled, vulnerable and older people. This will be achieved through working with partners to facilitate the appropriate quantity and quality of housing. In addition, specialist housing should be integrated into the wider area through careful design and the sharing/joint use of facilities to encourage a sense of community belonging and social interaction, where applicable.
- 4.25** The existing gypsy and traveller site at Old Willow Close (as shown on the Policies Map) has been safeguarded to meet the borough's gypsy and traveller accommodation need<sup>(27)</sup>. We will also seek to deliver and safeguard any further pitches which may be provided adjacent to the existing site, following completion of the Elizabeth line development.
- 4.26** Part 5 aims to encourage new residential developments to meet local and strategic housing market needs<sup>(28)</sup>. There is a concern at a regional level that a portion of new build homes in London are not being used in a way which meets housing need and GLA-commissioned research indicates that Tower Hamlets has the second highest percentage of overseas sales in London<sup>(29)</sup>. Developers are encouraged to sign up to

25 London Strategic Housing Market Assessment (GLA, 2013)

26 The Home Quality Mark is a new residential quality design and construction standard, developed by the Building Research Establishment.

27 This need is identified in the Tower Hamlets Gypsy and Traveller Needs Assessment. The safeguarded site meets our statutory requirement to ensure adequate provision of sites to meet the needs of gypsies and travellers who meet the new government definition of gypsies, travellers and travelling showpeople (Policy for Traveller Sites, Department for Communities and Local Government, 2015). Any additional capacity on the site will contribute towards providing culturally appropriate housing for gypsies and travellers who do not meet the new planning policy definition.

28 This is assessed in the Tower Hamlets Strategic Housing Market Assessment (2014 and 2017) and London Plan (GLA, 2016).

29 Overseas Investors in London's New Build Housing Market (University of York, 2017)

the Mayor of London’s Mayoral Concordat on Housing Development or any replacement scheme which encourages the marketing of new homes for sale to Londoners in the first instance.

### Policy links

- Policy S.SG1: Areas of growth and opportunity within Tower Hamlets
- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG5: Developer contributions
- Policy D.OWS2: Creating a network of water space

### Evidence links

- Planning Obligations Supplementary Planning Document (Tower Hamlets)
- Tower Hamlets Housing Strategy (2016)
- Good Practice Guide to Estate Regeneration (GLA, 2016)

### Policy D.H2: Affordable housing

1. Development is required to maximise the provision of affordable housing in accordance with a 70% rented and 30% intermediate tenure split.
2. Development is required to maximise the delivery of affordable housing on-site.
  - a. Affordable housing calculations will be based on habitable rooms.
  - b. Off-site affordable housing will only be considered in circumstances where it:
    - i. is not practical to provide affordable housing on-site;
    - ii. does not result in an over-concentration of one type of housing in any one local area to ensure mixed and balanced communities;
    - iii. can provide a minimum of 50% affordable housing overall, subject to viability; and
    - iv. can provide a better outcome for all of the sites, including a higher level of rented family homes.
  - c. If a suitable site cannot be found in accordance with part 2(b), exceptional circumstances may apply and payments in-lieu will be considered.
  - d. Where a housing development has been permitted and the permission is either subsequently amended (e.g. by means of a variation) to provide more units, or the existing development is extended to provide more units by the granting of a new permission on the same or an adjoining site which is physically or functionally linked; the new units will be considered as part of the existing development and the affordable housing calculation for the new units will reflect the whole development.
3. Development is required to provide a mix of unit sizes (including larger family homes) in accordance with local housing need, outlined in the table below.

Unit size	Market	Intermediate	Affordable rented
1 bed	30%	15%	25%
2 bed	50%	40%	30%
3 bed	20%	45%	30%
4 bed			15%

4. Development which involves the conversion of family homes will only be permitted when a 3-plus bed unit is retained in the new development. Where applicable, the retained family unit should have access to a private garden.
5. Estate regeneration development schemes are required to:
  - a. protect and enhance existing open space and community facilities;
  - a. protect the existing quantum of affordable and family units, with affordable units re-provided with the same or equivalent rent levels.;
  - b. provide an uplift in the number of affordable homes; and
  - c. bring existing homes up to the latest decent homes standard.
6. Major developments and estate regeneration schemes are required to undertake thorough and inclusive public consultations proportionate to the nature and scale of development and submit a consultation statement detailing these activities.

**Explanation**

- 4.27** Tower Hamlets faces an acute housing need - in particular affordable family housing - a need which is replicated across London. In addition, we face considerable challenges in delivering homes which are affordable to local people on average-to-medium incomes, who are unable to access social housing or afford market housing, particularly if they have children<sup>(30)</sup>.
- 4.28** The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs.
- 4.29** Where the development provides up to 35% affordable housing, as per policy S.H1 above, the affordable housing provision should be comprised of:
- 70% rented element, of which 50% should be London affordable rents and 50% should be Tower Hamlets living rent; and
  - 30% intermediate element, which can include London living rent, shared ownership and other intermediate products<sup>(31)</sup>.
- 4.30** Larger intermediate units (3 or more bedrooms) should be prioritised as London Living Rent products, and generally, shared ownership will not be considered appropriate where unrestricted market values of a unit exceed £600,000 (as per the Affordable Housing and Viability Supplementary Planning Guidance [GLA, 2016]). Where the development provides more than 35% affordable housing, the tenure of the additional affordable homes will be subject to negotiation. GLA developed products (including the London Affordable Rent and London Living Rent) may be subject to change over the plan period. Our affordable housing service will provide further guidance on suitable products when assessing applications. Rent levels are determined as part of the viability assessment of each planning application and undertakings are made to retain similar rent levels at the point of completion. The ownership of affordable homes must be transferred to one of our approved local registered providers or other approved affordable housing providers.

30 These needs have been identified through the Tower Hamlets Strategic Housing Market Assessment, which sets out the housing requirements arising from expected population growth.  
 31 Further guidance is provided in the Approval to Proceed with Guidance on New Rent Levels (2017)

- 4.31** Part 2 (a) requires proposals to calculate affordable housing using habitable rooms as it ensures the provision of a range of housing sizes more likely to meet the needs identified in the latest housing needs assessment. It is expected that there should not be a greater than 5% variation in floorspace between the private and affordable units, excluding units designed for wheelchair use. This prevents an under-provision of affordable housing where the developer proposes unusually large market homes.
- 4.32** In the majority of cases, affordable housing should be delivered on-site. This is important in promoting mixed and balanced communities. In some circumstances, site constraints may lead to applicants proposing to provide affordable housing off-site or through payments in-lieu to contribute to the delivery of affordable housing and in particular rented family housing.
- 4.33** In cases where proposals are seeking to provide housing off-site, there should be no over-concentration of one type of housing in any one area (both off-site and on-site) and a minimum of 50% affordable housing must be provided overall. Part 2 (a and b) gives further guidance. In addition, the design of the off-site development, the living environment for residents and other elements of the scheme must demonstrate advantages to residents over the option of affordable housing provided on-site.
- 4.34** If no suitable sites are available for off-site affordable housing and payment in-lieu is to be acceptable, developers must demonstrate that the payment will enable the construction or purchase of a minimum of 50% affordable housing in the borough and there is no financial advantage to the development of not providing affordable housing on-site. This must be evidenced through the financial viability statement. The payment in-lieu will be ring-fenced for additional affordable housing output.
- 4.35** Part 2 (d) refers to incremental development. This is housing development where permission is subsequently amended (e.g. by means of a variation of the extant planning permission) to the extent that the amended development would provide new units or the existing development is extended by the granting of a new permission on an adjoining site where the units would be physically or functionally linked (e.g. sharing a common access core, amenity space or other communal facilities) and the linked development would provide new units. In these circumstances, we consider the new units to be part of the existing development and the affordable housing requirements will be calculated accordingly. In both cases, where the amended or linked development would provide 11 units or more in aggregate, affordable housing should be provided, as per part 2 (a to c) above. If it would result in less than 11 new units in aggregate, policy S.H1 will apply. The recalculation will be undertaken via a financial viability assessment, in line with our latest guidance.
- 4.36** Part 3 requires proposals to provide a range of unit sizes. Developments may be required to meet updated identified needs as a result of monitoring. Unit size distribution will be calculated by unit numbers and not habitable rooms.
- 4.37** In view of the high housing target and the shortage of family housing in the borough, part 4 seeks to ensure that priority family housing is not unnecessarily lost through development. In order to manage the current shortage of family homes (three or more bedrooms), proposals to convert family homes into smaller self-contained flats will be resisted, unless the conversion enables the retention of a family unit. The continued access to a private garden for the family unit, where applicable, is considered to be appropriate due to the shortage of traditional forms of family housing within the borough. Conversion to residential uses identified as hostels or other forms of shared accommodation (including homes for multiple occupation) will also be resisted.
- 4.38** Housing estates in the borough provide a large number of affordable homes, as well as much valued open space and community facilities. Part 5 recognises the importance of retaining these facilities and the existing quantum of affordable housing. Where it would result in an improvement in quantity and quality of open space or community facilities, re-provision will be allowed. Affordable units must be re-provided with the same or equivalent rent levels. This policy also recognises that additional homes may be provided through estate regeneration schemes and seeks to secure that any net additional homes are also subject to the affordable housing requirements in policies S.H1

(see part 2) and D.H2 (see parts 1 and 2). Part c ensures that any estate regeneration scheme provides higher quality homes which meet the latest decent homes standards.

**4.39** Part 6 seeks to ensure that residents, businesses and other stakeholders are able to properly influence and shape the proposed development at the earliest opportunity, helping to better deliver sustainable communities. This is particularly important due to the levels of development taking place in the borough alongside existing communities. The Tower Hamlets Statement of Community Involvement should be used as best practice guidance to inform the types of consultation and co-production methods which proposed developments and estate regeneration schemes are expected to undertake in accordance with the consultation and engagement principles outlined in the Good Practice Guide to Estate Regeneration (GLA, 2016), or any replacement document. Consultation must be undertaken in advance of submitting a planning application. The consultation statement will be required at planning application validation stage.

**Policy links**

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG5: Developer contributions
- Policy S.CF1: Supporting community facilities
- Policy S.OWS1: Creating a network of open spaces

**Evidence links**

- Affordable Housing and Viability Supplementary Planning Guidance (GLA, 2017)
- Good Practice Guide to Estate Regeneration (GLA, 2016)
- Housing Supplementary Planning Guidance (GLA, 2016)
- Tower Hamlets Statement of Community Involvement

**Policy D.H3: Housing standards and quality**

1. Development is required to demonstrate that:
  - a. as a minimum, it meets with the most up-to-date London Plan space and accessibility standards;
  - b. it provides a minimum of 2.5 metres floor-to-ceiling heights; and
  - c. at least 10% of new homes are designed to be suitable for occupation by a wheelchair user or could easily be adapted for occupation by a wheelchair user.
    - i. Where wheelchair accessible units are to be delivered above the ground floor, access to a second lift must be provided.
    - ii. In exceptional circumstances, where wheelchair units cannot be accommodated on site, contributions in-lieu will be accepted.
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.
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.
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.



- 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.
- 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.

### Explanation

**4.40** Currently, Tower Hamlets is London’s most densely-populated borough after Islington. Achieving the borough’s high housing target will result in further intensification of land use and therefore require an appropriately quality-driven response to maintain and improve standards of living in the borough. High density developments necessitate that development delivers higher than the minimum design, space and amenity standards.

**4.41** Part 1 (a and b) seeks to ensure all housing development provides adequate internal space to meet relevant space, accessibility and amenity standards and provide an appropriate living environment. It requires development to comply, as a minimum, with the space and accessibility standards set out in the London Plan (GLA, 2016) and the Housing Supplementary Planning Guidance (GLA, 2016), whilst having regard to the particular needs of residents in the borough as well as the increasingly dense character of the built form. If the GLA’s space and accessibility standards are updated, we may seek to implement these changes, so long as they are locally suitable. We strongly urge developers/applicants to provide evidence of how the scheme will achieve high quality design in line with the Home Quality Mark standards.

**4.42** In order to implement part 1 (c) and meet standards in the Housing Supplementary Planning Guidance (GLA, 2016), 10% of all new units across all tenures should be wheelchair accessible or wheelchair adaptable, but this may be varied to at least 10% of habitable rooms where a better outcome is provided in terms of delivery of larger units. All wheelchair units in the affordable tenure should be wheelchair accessible (not adaptable). It is expected that wheelchair accessible units above the ground floor will be provided with access to a second lift for use when the primary lift is not functioning. We have a preference that wheelchair accessible units will be provided below the fifth floor due to difficulties allocating wheelchair accessible units on higher floors<sup>(32)</sup>. In some circumstances, site constraints (such as the inability to secure sufficient accessible parking, lack of lift circulation space and restrictions on ground floor residential uses) could lead to applicants arguing that wheelchair units may not be able to be delivered on site. In these circumstances, we may accept payments in lieu of the provision of wheelchair units through the ‘Project-120’ scheme<sup>(33)</sup>.

**4.43** Part 2 provides guidance that private and affordable housing should not be distinguishable. Different tenures should be mixed throughout a development, although it is recognised that separate cores may be required to enable effective management.

**4.44** be fully fit for purpose, developers must use hard-wearing, durable materials to ensure it remains of high quality throughout the lifetime of the development. This should be evidenced in the design and access statement. In addition, all family-sized affordable homes should have separate kitchen and living rooms, due to local needs. For further guidance, please contact our affordable housing service and/or refer to the Tower Hamlets Housing Forum’s Section 106 Design Guide.

**4.45** Part 4 aims to ensure that all existing amenity space is protected. Where it would result in an improvement in quantity and/or quality of open space, re-provision will be allowed. Part 5 seeks the provision of new outdoor amenity space on-site which is well located, well designed and

32 Tower Hamlets Accessible Housing Register Categories - A Wheelchair Standard (2010)

33 We are working with the borough’s development partners to ensure that new homes for wheelchair users are designed to meet the specific needs of families on the affordable housing register and thereby reduce the number of tenants requiring specifically adapted wheelchair accessible homes and the length of time they have been waiting to secure a suitable home.

functional (including private amenity space, communal amenity space and child play space) to provide opportunities for residents to lead healthy and active lifestyles.

- 4.46** 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.
- 4.47** Due to the positive impacts of access to nature in terms of well-being, a significant amount of amenity space should include soft landscaping. This also provides greater opportunity to incorporate biodiversity elements and sustainable urban drainage systems. In considering the design and layout of communal space, it is important that this space is integrated into the overall design of the development and the wider public realm. The design should ensure that communal space is overlooked and supports a range of activities including space for relaxation, gardening, urban agriculture and opportunities to promote biodiversity, ecology and intergenerational community cohesion.
- 4.48** In considering the design and layout of child play space, it is important to ensure that this responds to the needs of children within the development. Play space for all children should be provided on site. 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<sup>(34)</sup>. This space should be well-integrated into the development and fully considered in the design of the communal space. However, play provision requirements must be provided in addition to other quantitative standards, such as open space provision and communal space provision. In order to demonstrate that the proposed play space is of high quality, applicants will be required to demonstrate within the health impact assessment how they have used Play England's 10 key design principles for creating successful play spaces.<sup>(35)</sup>

#### Policy links

- Policy D.SG3: Health impact assessments
- Policy S.DH1: Delivering high quality design
- Policy D.DH7: Amenity
- Policy S.OSW1: Creating a network of open space
- Policy D.OSW3: Open space and green grid network
- Policy D.ES2: Air quality
- Policy D.TR3: Parking and permit-free

#### Evidence links

- Housing Supplementary Planning Guidance (GLA, 2016)
- Shaping Neighbourhoods: Play & Informal Recreation Supplementary Planning Guidance (GLA, 2012)
- Tower Hamlets Child Yields Calculator (2017)
- Joint Strategic Needs Assessment: Planning and Health (Tower Hamlets)

34 Shaping Neighbourhoods: Play & Informal Recreation Supplementary Planning Guidance (GLA, 2012)

35 For more details, please see the Tower Hamlets Joint Strategic Needs Assessment: Planning and Health (2016)

**Policy H4: Specialist housing**

1. Existing specialist and supported housing will be protected where it is considered suitable for its use and meets relevant standards for this form of accommodation.
2. The redevelopment of any site which includes specialist and supported housing is only considered acceptable where:
  - a. there is no longer an identified need for its retention in the current format;
  - b. the needs met by this form of housing will be re-provided elsewhere within the borough, resulting in no net loss of this provision;
  - c. re-provision as part of a development proposal would result in improved standards and quality of accommodation; and
  - d. new accommodation meets the criteria in part 3 below.
3. Development for new specialist and supported housing is supported where it can be demonstrated that it:
  - a. meets an identified need;
  - b. is of high quality and meets relevant best practice guidance for this form of accommodation;
  - c. is located in close proximity to public transport and local shops and services; and
  - d. includes provision of affordable units, where appropriate.

**Explanation**

- 4.49** This policy aims to ensure that there is a sufficient supply of appropriate housing available for older people, homeless people, disabled people and vulnerable people to live as independently as possible in accordance with our statutory duties. It also seeks to protect appropriate staff accommodation ancillary to a relevant use.

- 4.50** The Tower Hamlets Housing Strategy (2016-2021) seeks to create more choice so that development meets a wide range of housing needs. The London Plan (GLA, 2016) provides an indicative benchmark for specialist housing for older people. The benchmark for Tower Hamlets is 70 units a year, of which 45 units should be an affordable product.

- 4.51** Examples of specialist housing include:

- sheltered housing - commonly self-contained homes with limited on-site support (usually within use class C3);
- residential care homes - commonly bedsit rooms with shared lounges and eating arrangements (within use class C2);
- nursing homes - similar to residential care, but accommodating ill or frail elderly people, and staffed by qualified nursing staff (also within use class C2);
- dual-registered care homes - residential care homes where nursing care is provided for those residents who need it (also within use class C2);
- extra-care homes - combinations of the above providing independent living alongside care and support, and sometimes also offering support for older people in the wider community; and
- staff accommodation ancillary to a relevant use.

- 4.52** Development proposals will need to submit details of how they meet the requirements set out in part 2 (a to d) and the need for specialist housing set out in part 3 (a to d). Any net loss will be measured using units (for use class C3) and bedspaces (for use class C2), with reference to relevant council or other public sector strategies.

- 4.53** New development is required to make use of best practice guidance (as set out below) to develop accommodation which is suitable for the specialist needs of the intended occupants.

- 4.54** In addition, new development must demonstrate that it is accessible in terms of location and individual mobility needs. Close proximity to local services is considered to be a walkable distance of no more than 10 to 15 minutes. Where appropriate, the proposed scheme should provide necessary storage for mobility scooters. In addition, opportunities to



integrate the development into the wider area should also be explored to encourage a sense of belonging (especially among people from different generations) as well as protect against loneliness and isolation.

**4.55** Part 3 also ensures that specialist housing contributes to mixed and balanced communities. Older persons housing will be required to be delivered across tenures in accordance with the latest Tower Hamlets Strategic Housing Market Assessment. It is expected that all specialist housing in use class C3 will provide affordable homes, in line with policies S.H1 and D.H2.

**4.56** All proposals for specialist and supported housing will be referred to our adult health service to consider the approach to safeguarding and also ensure that a good quality service can be provided to vulnerable people.

**Policy links**

- Policy D.DH7: Amenity
- Policy S.TR1: Sustainable travel

**Evidence links**

- Housing Supplementary Planning Guidance (GLA, 2016)
- HAPPI Guidance and Halsall Lloyd Partnership, Design for Dementia (Homes and Community Agency, 2015)
- Tower Hamlets Housing Strategy (2016-2021)
- Tower Hamlets Strategic Housing Market Assessment (2017)

**Policy D.H5: Gypsies and travellers accommodation**

1. Development of a site to meet the long-term needs of gypsies and travellers is required to:
  - a. be suitable for housing;
  - b. be in an accessible and safe location;
  - c. employ high quality design and be sympathetic to local character and design;
  - d. maintain and enhance the quality of the environment; and
  - e. not be located in an area of high flood risk (flood zone 3).

**Explanation**

**4.57** In addition to safeguarding the gypsy and traveller site at Old Willow Close and securing any new pitches that arise as a result of the completion of the Elizabeth line at Old Willow Close, proposals which include new gypsy and traveller sites will be considered against the criteria set out above in line with government guidance<sup>(36)</sup>.

**4.58** This policy aims to ensure that new gypsy and traveller sites are well integrated into their surroundings and respect the interests of existing settled communities. Any new provision should be prioritised for permanent facilities, rather than transit sites, due to the local gypsy and traveller need.

**Policy links**

- Policy S.DH1: Delivering high quality design
- Policy D.DH7: Amenity
- Policy D.ES4: Flood risk

36 Policy for Traveller Sites (Department for Communities and Local Government, 2015)

## Evidence links

- Policy for Traveller Sites (Department for Communities and Local Government, 2015)

## Policy D.H6: Student housing

1. Proposals involving new purpose-built student accommodation should be directed to locations which are within close proximity to the borough's higher education institutions and in highly accessible locations and must:
  - a. not compromise the supply of land for self-contained homes;
  - b. have an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide an element of affordable student accommodation;
  - c. respect existing residential amenity; and
  - d. provide 10% of student rooms which are easily adaptable for occupation by wheelchair users.
2. The net loss of student accommodation will only be supported where:
  - a. it can be demonstrated that the accommodation is no longer needed because the needs of students can be better met elsewhere; or
  - b. adequate replacement housing will be provided in accordance with policy D.H6 and criteria (a to e).

## Explanation

**4.59** This policy seeks to support the delivery of student accommodation in suitable and appropriate locations due to the positive impacts it brings to the local economy, our communities and the borough's higher education sector. However, the delivery of a significant amount of student housing may compromise our ability to deliver other priorities, including self-contained housing, employment and infrastructure provision. As such, the delivery of student accommodation needs to be managed in accordance with strategic needs and local priorities.

**4.60** In the context of this policy, student housing relates to private student accommodation, student accommodation with an undertaking with an institution and accommodation provided by an institution. Appropriate

locations predominately consist of a dense urban grain where the introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport. Close proximity is defined as adjacent to the institution or within walkable distance of 10 to 15 minutes.

- 4.61** Proposals involving the development of student housing must demonstrate that it will not involve the net loss of existing self-contained homes and/or will not involve land identified for self-contained housing through a current planning permission or through a site allocation set out in the borough's development plan.
- 4.62** Part 1 (a) supports the delivery of affordable student housing in accordance with the London Plan (GLA, 2016). We will use the Housing Supplementary Planning Guidance (GLA, 2016) to negotiate the proportion of affordable housing, its cost and its allocation to students (an indication of the level of rent and the proportion of affordable housing will be provided through the London Plan annual monitoring report). This suggests that the cost should be no more than 55% of average student income for a UK full-time student living in London away from home, and suggests that the proportion of affordable housing should be the maximum reasonable amount, subject to viability. Planning obligations will be used to secure the affordability and availability of the affordable accommodation for as long as the student housing use continues.
- 4.63** Part 1 (b-c) seek to ensure the suitability of the accommodation in terms of its relationship with the surrounding environment and in terms of living standards. Development will be required to demonstrate how it meets these criteria. There are concerns regarding an over-concentration of student housing in some areas which may have an impact on the amenity of existing residents. The issues relate to noise disturbance or the loss of shops and services that meet the needs of longer term residents. We will therefore assess proposals for student housing having regard to any existing concentrations and the wider housing mix in the area. Where the scale or concentration of student housing is likely to harm the amenity of the local area and undermine the balance of housing and service provision, we will seek a range of mitigation measures, such as management conditions and additional infrastructure provision.

- 4.64** Part 2 relates to proposals involving the net loss of student accommodation. The loss of student accommodation should not create additional pressure on the existing housing stock and the supply of new housing, and thus it will only be supported where it can be demonstrated that it no longer serves a purpose or can be provided elsewhere.

#### Policy links

- Policy D.DH7: Amenity
- Policy S.TR1: Sustainable travel

#### Evidence links

- Affordable Student Accommodation Planning Guidance (GLA, 2016)
- Housing Supplementary Planning Guidance (GLA, 2016).
- London Plan Annual Monitoring Report (GLA)

**Policy D.H7: Housing with shared facilities (houses in multiple occupation)**

1. New houses in multiple occupation will be supported where they:
  - a. do not result in the loss of existing larger housing suitable for family occupation;
  - b. can be secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing;
  - c. are located in an area of high transport accessibility;
  - d. do not give rise to any significant amenity impact(s) on the surrounding neighbourhood; and
  - e. comply with relevant standards and satisfies the housing space standards outlined in policy D.H3.
2. The loss or self-containment of good quality homes for multiple occupation will be resisted unless:
  - a. it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation; or
  - b. adequate replacement housing with shared facilities will be provided that satisfies criteria (a to f) above.

**Explanation**

**4.65** Houses in multiple occupation (HMOs) refer to residential properties that take the form of shared houses, flats and non-self-contained dwellings. Planning permission is required for a HMO where there are more than six unrelated individuals forming a household who share a kitchen, bathroom or toilet. This definition is different to that used by the mandatory licencing scheme. HMOs have traditionally provided lower cost housing, including for those under 35 years of age in receipt of the

shared room rate housing benefit. However, there has been a recent growth in London of purpose-built, large-scale, higher quality HMOs charging commercial market rents<sup>(37)</sup>. This includes, for example, accommodation modelled on student housing but available for a wider range of occupants.

**4.66** The Greater London Authority (GLA) household projections suggest there is an increasing demand for HMO-style accommodation in the borough, particularly among young people. The number of 'other type' households (which includes HMOs) headed by persons aged 16-34 is projected to rise from 12,295 in 2016 to 16,555 in 2031. High quality, large-scale HMOs can help meet this need. However, reflecting the changing role of HMO-style accommodation in the borough and the acute shortage of affordable housing, it is appropriate that all forms of market housing (including HMOs) contribute towards meeting the high affordable housing need.

**4.67** Part 1 (b and c) ensures development contributes towards maintaining mixed and balanced communities. Our affordable housing service - using the evidence from the latest strategic housing market assessment - will assess the proposed rent levels to determine whether the development would primarily provide housing with shared facilities for people with low incomes. Where it would not meet the housing needs of those on low incomes, developments will be required to meet the affordable housing requirements outlined in policies S.H1 and D.H2. Affordable housing contributions will be sought from all residential developments (as per the GLA's Housing Supplementary Planning Guidance).

**4.68** The high-density nature of HMO development means that they should be provided in sustainable locations and must demonstrate they will not create adverse amenity impacts to the immediate and/or surrounding residential area. In order to address this, HMOs should be found in locations which have suitable transport and which will not cause amenity impacts to the surrounding area. Where appropriate, we will seek a planning obligation to protect local amenity (for example, by securing a management plan).

37 Making the most of build to rent' (Future of London, '2017)

**4.69** HMO developments must provide high quality living space, in line with relevant standards. Applicants should also ensure that HMOs satisfy the appropriate environmental health and fire safety standards.

**4.70** Part 2 of the policy seeks to protect existing HMOs where they are of a suitable standard.

**Policy links**

- Policy S.DH1: Delivering high quality design
- Policy D.DH7: Amenity
- Policy S.TR1: Sustainable travel

**Evidence links**

- Housing Supplementary Planning Guidance (GLA, 2016).

Chapter 5: Delivering economic growth

Introduction

- 5.1 Tower Hamlets plays a significant role in London’s global economy. The west of the borough forms part of the Central Activities Zone (see figure 11) which contains London’s core functions and activities, such as government administration, culture and business. Canary Wharf, located to the north of the Isle of Dogs, contains some of the world’s largest financial and professional service organisations.
- 5.2 The borough has a proud history of entrepreneurialism amongst local people, with businesses ranging from small family companies, creatives, start-ups, light manufacturers and small-to-medium enterprises, through to multinational corporations. There has also been a growth in hi-tech and creative industries over the last few years, as well as businesses moving from more central parts of London to take advantage of lower rents. Employment space has, however, come under increasing development pressure and legislative changes have broadened the scope of permitted development without full planning applications. Industrial land in particular has been lost at a faster rate than originally planned, creating a shortage that could undermine the ability of the borough and the key international business locations of Canary Wharf and the City of London to function effectively. Alongside this, there has been a shift in the type of employment space that employers and start-ups require; this pressure has meant that it is not just availability but also affordability of employment space that has become an issue, thus threatening the business-focused dynamism of local people and the borough’s industrial heritage.
- 5.3 Jobs in the borough are projected to rise from 285,600 in 2015 to 410,600 in 2031, an increase of 44% (125,000 jobs) - by some way the highest growth figure in London<sup>(38)</sup>. This is based on previous growth trends being maintained into the future; between 2005 and 2015 there was a comparable jobs increase of 47%. An alternative projection is provided by Experian, one of the UK’s major economic forecasters, which is based on an overall assessment of the national and local economy

and apportions growth more equally across London. While this is a more modest forecast than the Greater London Authority’s projections, projected growth is still significant at 36,481 jobs. Tables 2 and 3 below set out these figures along with assumptions on the net additional floorspace that would be required.

- 5.4 The tables show that while our evidence can demonstrate sufficient capacity in the borough to exceed the lower office projections from Experian, there is a large shortfall compared to the GLA’s projections<sup>(39)</sup>. With the GLA figures being based on previous trends, it is prudent to plan on the basis of the Experian figures being far exceeded. On both sets of projections there is a shortfall of industrial floorspace compared to demand. As such, it is vital that existing provision is protected where it continues to meet a need and that new space is encouraged in appropriate locations to meet future demand as well as protect the world-class employment hubs of the City Fringe and Canary Wharf. Consequently, we are seeking to introduce article 4 directions to remove permitted development from employment uses in key locations.

Table 2 :Floorspace & job projections

	Experian (minimum)		GLA projections (aspirational)	
	Floorspace (square metres)	Jobs	Floorspace (square metres)	Jobs
Office	435,879	35,716	1,384,250	122,500*
Industrial	36,366	765	110,000	2,500*

\*The Greater London Authority (GLA) projection provides an overall jobs figure of 125,000 and does not differentiate between office and industrial; the figures stated are informed by the percentage breakdown of the Experian figures (98% for office and 2% for industrial).

38 <https://data.london.gov.uk/dataset/long-term-labour-market-projections>  
 39 Tower Hamlets Employment Land Review (2016)

Table 3 : Supply of employment land compared to projections (square metres)

	<b>Experian</b>	<b>GLA</b>
Office	+401,111	-547,260
Industrial	-191,536	-265,170

- 5.5** While the GLA projections cannot be met from identified sites in the development pipeline, capacity exists to make up the shortfalls cited in table 3. For both office and industrial uses, there are opportunities within designated employment locations to add a significant quantum of floorspace through the intensification of existing provision. For both offices and industrial uses, there are numerous opportunities for new floorspace to be delivered through 'windfall' sites, generally through mixed-use developments across the borough and in the site allocations listed in section 4.
- 5.6** This chapter relates to employment uses within the 'B' use classes (business, general industrial and storage and distribution) and sui generis industrial functions. While other use classes create employment these are covered within other policy sections within the Local Plan.
- 5.7** This section contains the following policies.
- Policy S.EMP1: Creating investment and jobs
  - Policy D.EMP2: New employment space
  - Policy D.EMP3: Loss of employment space
  - Policy D.EMP4: Redevelopment within the borough's employment areas



## Policy S.EMP1: Creating Investment and Jobs

1. Development which supports, protects and enhances the role and function of the borough’s designated employment locations (as defined on the Policies Map) and maximises the provision of employment floorspace to meet the borough’s target of creating 125,000 new jobs over the period to 2031 will be supported in line with the principles set out below.

Designated Employment Locations		
Designation	Role and function	Location
<b>Primary Preferred Office Location (POL)</b>	This predominantly consists of offices, and is most suitable for buildings with large floor-plates which can provide significant numbers of jobs. It is unsuitable for housing or any other use which could undermine its function and prevent the delivery of sufficient land for employment use.	Canary Wharf
<b>Secondary Preferred Office Location (POL)</b>	These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant weight is given to office and other strategic Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must not exceed 25% of the site area and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.	These are illustrated on the Policies Map.
<b>Central Activities Zone (Zone C)</b>	This zone contains areas of the CAZ outside of the POL Primary Cores and Secondary Zones. They are relatively peripheral compared to the Primary and Secondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose-built office buildings and significant provision of office and other employment uses as part of mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations.	These are illustrated on the Policies Map.
<b>Local Employment Locations (LEL)</b>	These are areas of high accessibility that provide or could provide significant capacity for employment accommodation meeting secondary, local or specialist employment needs, and to support the needs of start-ups, small-to-medium enterprises, grow-on space and creative and digital industries	Blackwall - which provides secondary large floorplate offices, smaller units suitable for small-to-medium enterprises and data centres which support the needs of Canary Wharf and the City of London.



Designated Employment Locations		
Designation	Role and function	Location
		<p>Cambridge Heath - which provides a range of office, industrial and studio workspaces meeting the needs of businesses serving a more local need, start-ups, small-to-medium enterprises and creative industries.</p> <p>Tower Gateway East - which provides a variety of units supporting both local need and the needs of businesses within surrounding POLs and the City of London.</p> <p>Whitechapel - which provides small office spaces meeting local needs alongside a the bio-tech and life sciences sector, creative and knowledge-based industries and growing demand from an eastwards expansion of the city of London.</p>
<b>Strategic Industrial Location (SIL)</b>	This designation plays an important sub-regional industrial, warehousing and waste management role serving not just the borough but other parts of central London. Housing is not suitable in these locations due to potential conflict with existing and future industrial uses.	Empson Street – this should be safeguarded in accordance with London Plan policies.
<b>Local Industrial Locations (LIL)</b>	LILs provide important areas of light-manufacturing/industry and warehousing to meet a more local need and provide local employment opportunities, as well as to support the needs of the global business centres of Canary Wharf and the City of London.	<p>Blackwall Trading Estate</p> <p>Gillender Street</p> <p>Poplar Business Park</p> <p>The Highway</p> <p>Thomas Road</p>
<b>Other locations</b>		

Designated Employment Locations		
Designation	Role and function	Location
<b>Tower Hamlets Activity Areas (THAA) &amp; designated town centres</b>	The Tower Hamlets Activity Areas, District Centres and larger Neighbourhood Centres also provide opportunities for purpose-built office buildings with ground-floor retail and leisure uses. The activity areas in particular have the potential to accommodate substantial employment growth to support the strategic role of the neighbouring CAZ and Primary and Secondary POLs.	
<b>Non-designated employment sites</b>	These are sites or units outside of the areas described above. Cumulatively, they provide significant floorspace and jobs across a variety of sectors.	

2. Proposals will be supported which provide opportunities to maximise and deliver investment and job creation in the borough through:
  - a. supporting and promoting the competitiveness, vibrancy and creativity of the Tower Hamlets economy;
  - b. protecting the borough's global, national, regional and local economic roles in delivering jobs and supporting businesses;
  - c. ensuring a range of job opportunities at all levels are provided throughout the borough, particularly within designated employment locations, the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres; and
  - d. ensuring the borough's residents have access to education and skills that will enable them to benefit from local employment and enterprise opportunities.
  
3. Proposals will be supported which provide opportunities to promote the creation of a sustainable, diverse and balanced economy through:
  - a. ensuring availability of a range of workspaces and unit sizes, start-up space, co-working space and 'grow-on' space by protecting existing floorspace and encouraging the provision of new floorspace; and
  - b. working with affordable and shared workspace providers to bring forward affordable, flexible and shared workspace.

## Explanation

**5.8** This policy sets out our approach to employment provision in relation to the level and distribution of jobs across the borough over the period to 2031. This will help to ensure successful and sustainable local and sub-regional economies, promoting and facilitating a range of employment spaces to meet the needs of different types of occupiers across different locations (see figure 11 and the Policies Map).

**5.9** We will work with applicants during the pre-application process to ensure that proposals are consistent with the needs and character of their locations, while addressing policies set out elsewhere within this section and the wider Local Plan.

**5.10** Additional office floorspace forms a substantial element of the borough's future employment projections. Canary Wharf and the City Fringe contain a high proportion of primary and large floorplate offices which form part of globally-significant employment clusters. As such, these areas need

to be protected and supported to ensure the delivery of sufficient high quality employment land to meet borough-wide needs. This will be achieved through the designation of Preferred Office Locations (POLs)<sup>(40)</sup>.

- 5.11** The Central Activities Zone (CAZ) and the north of the Isle of Dogs (including Canary Wharf) has been subdivided into three distinct zones<sup>(41)</sup>. Commercial core areas (zone A) are deemed to be unsuitable locations for housing or other uses which would undermine the strategic functions of the CAZ and the north of Isle of Dogs<sup>(42)</sup>. Employment and defined strategic functions/uses must be given greater weight than residential (zone B) or equal weight to residential use (zone C – which only applies within the CAZ).
- 5.12** Part 1 of the policy identifies the borough's Primary POL (zone A) which corresponds with the "commercial core area" of the north of the Isle of Dogs. This area has a high concentration of significant office functions, with high levels of activity and accessibility to London and the wider region.
- 5.13** The Secondary POL (zone B) covers parts of the City Fringe and north of the Isle of Dogs. These areas are also key existing or potential employment locations with offices and other strategic functions as the dominant land use. However, in contrast to the Primary POL, residential uses will be acceptable so long as they do not undermine the supply of offices and other strategic uses and do not utilise more than 25% of the proposed site area. This approach seeks to ensure residential development does not prejudice the future intensification of employment floorspace or undermine the predominant employment function of these areas. This will help achieve a sensitive transition between the Primary POL and surrounding areas.
- 5.14** The remainder of the CAZ which is outside of the Secondary POL (zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace relative to

the surrounding context of the site (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged).

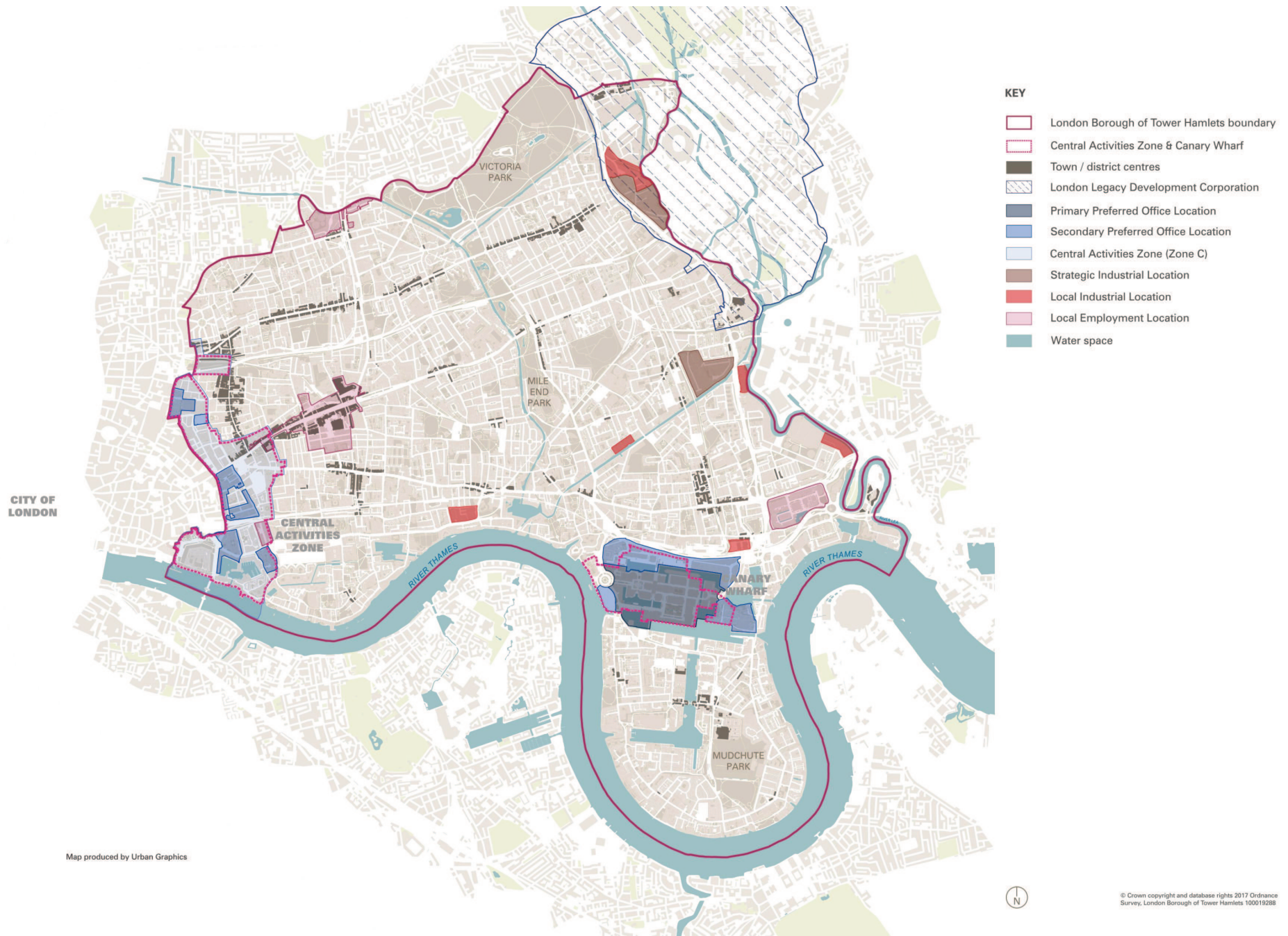
- 5.15** The borough's Local Employment Locations (LELs) have relatively high public transport accessibility levels and support significant numbers of jobs but have unique individual characteristics. Applicants should aim to ensure that new employment space that is brought forward contributes to and meets the demands of each area. In particular within the Whitechapel LEL, applicants should also refer to the Whitechapel Vision Masterplan Supplementary Planning Document. New development within LELs will be expected to provide high-quality flexible workspace designed to meet the needs of emerging and growing sectors (e.g. research and development), to meet the needs of other small-to-medium enterprises and creative businesses.

40 Source: Preferred Office Location Boundary Review (2017).

41 Further details are provided in the Central Activities Zone Supplementary Planning Guidance (GLA, 2016).

42 These functions include: government institutions, internationally significant business headquarters, cultural, science and tourist facilities of national or international importance and centres of excellence in higher education.

Figure 11 :Distribution of employment hubs and locations





- 5.16** Tower Hamlets has a relatively limited supply of industrial land and floorspace, despite high levels of market demand, in the face of increasing competition from other land uses, such as housing. There are clusters of existing industrial activity predominantly in the north east of the borough along key transport routes. These sites need to be protected to support the long term needs of the borough and the role of the City of London and Canary Wharf as global economic hubs (some services need to be in close proximity to the end user and immediately available). This will be achieved through the designation of the Strategic Industrial Location (Empson Street) and Local Industrial Locations (see part 1). As well as retaining existing designations, new LILs have been identified at Blackwall Trading Estate and Thomas Road (as shown on the Policies Map) to secure the long term provision of industrial space.
- 5.17** Part 1 also highlights that town centres are locations in which non-retail employment uses will be supported, subject to the provision of active frontages at ground floor level. This is because town centres are located throughout the borough and are able to offer smaller spaces which meet the needs of businesses serving the local community. Within the Tower Hamlets Activity Areas and some District Centres and Neighbourhood Centres (as shown on the Policies Map), purpose-built office buildings can be supported where they are of a nature and scale which corresponds with their surroundings. Within the Primary and Secondary Frontages, employment spaces should be located on upper floors so as not to undermine the retail and leisure functions of those areas. Within the Tower Hamlets Activity Areas, an overall target of 20% of floorspace to be in employment use will be sought.
- 5.18** Proposals outside of designated employment areas and town centres (see part 1) will be supported where they demonstrate that there is a need and demand, with further detail set out in policy D.EMP2.
- 5.19** Part 2 describes how development should contribute to meeting our long term objectives to support investment and job creation in the borough. Tower Hamlets has a diverse economy ranging from the globally-significant financial centre of Canary Wharf and the associated services required to support it (and the neighbouring City of London) to creative and cultural industries, industrial uses, secondary offices and

businesses, meeting a very local need. Employment activities are distributed across the borough with specific locations supporting clusters of particular businesses or unit types. Development that contributes to meeting these objectives will be welcomed.

- 5.20** Part 3 supports the provision of a range of workspaces including affordable workspace, emphasising that spaces suitable for small-and-medium enterprises and microbusinesses are a vital element of the overall mix<sup>(43)</sup>. This has the dual benefit of supporting new and emerging economic sectors and providing additional space for small-and-medium enterprises and micro-businesses that provide employment for a significant proportion of the borough's population. Development incorporating a range of unit types and sizes will be encouraged, including where these are clustered within a single building and provide shared and networking facilities. Developments should address the most up-to-date requirements as part of pre-application discussions. We will particularly welcome proposals which demonstrate co-operation with recognised workspace providers, for which we hold an approved list. Opportunities for the long-term management of new units by a company specialising in flexible and affordable workspace provision should be fully explored as part of the planning application process and may be secured for the long term through planning obligations.

#### Policy links

- Policy S.TC1: Supporting the network and hierarchy of centres
- Policy D.TR2: Impacts on the transport network

#### Evidence links

- Tower Hamlets Employment Land Review (2016)
- Central Activities Zone Supplementary Planning Guidance (GLA, 2016)

**Policy D.EMP2: New employment space**

1. New or intensified employment floorspace will be supported within designated employment areas and the Tower Hamlets Activity Areas, as set out in policy S.EMP1.
2. Outside of designated employment areas and Tower Hamlets Activity Areas, new employment space will be directed to designated town centres and accessible locations along major transport routes.
3. New employment space will be supported at other locations to those specified in parts 1 and 2 above if:
  - a. it can be demonstrated that there is a reasonable prospect of occupancy;
  - b. the employment use would contribute towards integrated place making;
  - c. the area forms part of a cluster of similar employment uses; or
  - d. the employment space is being provided as part of a temporary use.
4. Within major commercial and mixed-use development schemes, at least 10% of new employment floorspace should be provided as affordable workspace.
5. New employment space must be completed to a standard which meets the needs of potential end users.
6. Development of employment and residential use in the same self-contained unit (i.e. live-work and work-live) will not be supported.

**Explanation**

- 5.21** Part 1 of the policy encourages the provision of additional employment floorspace to meet demand and the needs of different business types. Where new provision is proposed, it must be located in the most viable locations to support the role and function of the borough's designated employment areas and to proactively avoid long-term vacancy or subsequent conversion to other uses. This policy seeks to direct new provision to the designated employment areas as a first priority, then to locations of highest activity, accessibility and visibility (see part 2) and finally to other locations (see part 3) where it meets strict criteria.
- 5.22** For the purposes of this policy, major transport routes are considered to include the borough's A roads and other roads along the strategic highway network where there is a high level of accessibility, visibility and footfall.
- 5.23** Development outside of the areas referenced in parts 1 and 2 will be expected to demonstrate through a detailed marketing strategy that the demand within the relevant part of the borough has been assessed and that anticipated asking rents/purchase price for the new unit(s) would be appropriate to the location (according with indicative figures) or that an occupier for the space has been secured. This part of the policy also facilitates temporary employment units which can, for example, activate spaces that would otherwise remain redundant in advance of more permanent development. Temporary uses would be expected to only remain in place for a defined period of time, or until the site comes forward for development to meet its full potential or allocated use(s).
- 5.24** Part 4 seeks to ensure that major development (i.e. Which comprises of at least 1,000 square metres of commercial floorspace) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups<sup>(44)</sup>. In such cases, applicants should provide evidence of agreement to let the workspace 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. Applicants will

44 as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

be encouraged to work with recognised affordable workspace providers for which we hold an approved list, providing details of management arrangements.

**5.25** Part 5 aims to prevent long-term vacancy of new employment space caused by high fit-out costs and lack of supporting infrastructure deterring interest from potential tenants. For example development should provide sufficient cycle spaces, appropriate levels of natural light and a range of shared services and facilities appropriate to the size and scale of the unit (such as communal breakout spaces, kitchen areas, showers and childcare facilities) and not detract from the visual appearance of the development or its surroundings. In the case of office developments, high-speed broadband connectivity should be provided to serve the end user. Industrial developments would be expected to provide double-height units with appropriate access and good standards of internal sound insulation to minimise conflict with surrounding uses.

**5.26** Applications to convert live-work units into purely residential units and certificates of lawful development (where the units have not been used for employment purposes) demonstrate a lack of need to secure live-work or work-live within the same self-contained unit. In such cases, applications will not be supported (see part 6). Instead, we would welcome proposals that offer a range of uses (including employment and housing) as separate units within the same site.

#### Policy links

- Policy S.TC1: Supporting the network and hierarchy of centres
- Policy S.DH1: Delivering high quality design
- Policy S.TR2: Impacts on the transport network

#### Evidence links

- Tower Hamlets Employment Land Review (2016)

#### Policy D.EMP3: Loss of employment space

1. Development resulting in the net loss of existing employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported.
2. Development should not result in the loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they:
  - a. provide evidence of active marketing over a continuous period of at least 24 months at a reasonable market rent which accords with indicative figures; or
  - b. provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use.
3. Proposals involving the loss or reduction of employment floorspace within LELs must also demonstrate that alternative employment uses would not be viable and the loss of employment floorspace would not compromise the operation and viability of the wider LEL.

#### Explanation

**5.27** This policy describes the criteria that will be used to address the potential loss of employment space within the borough in line with the vision and objectives of the plan (see section 2). To ensure the supply of employment land to meet identified demand is maintained, proposals which result in the loss of employment floorspace within the POLs, SILs and LILs (as shown on the Policies Map and figure 11) will not be supported. Consequently, we will be seeking to implement an article 4 direction removing permitted development rights from offices to residential uses covering designated employment areas and other key locations. Within the Primary and Secondary POLs, the expectation is that development proposals are employment-led in line with the policies

and principles set out in policy S.EMP.1. The loss of such sites to non-employment uses will not be supported. Proposals involving the loss of industrial land that is located outside the SIL or LILs will be considered on a site-by-site basis in accordance with part 2 above.

**5.28** This policy also covers vacant sites within the POLs, SIL and LILs - protecting them from loss to other non-employment uses will ensure the supply of future employment land to meet projections (not just within the plan period but beyond) is not undermined.

**5.29** Part 2 requires evidence covering a continuous period of at least 24 months in order to prevent unnecessary loss of existing employment space which would put pressure on the ability of the borough to meet projected need. Applicants should outline where and how marketing has been undertaken, with details also provided to demonstrate that the asking rent has been at a realistic rate for the type, size and condition of the property/unit. Such information should accord with our indicative guidance which is regularly updated. It would be expected that the property or site has been actively marketed, including appearing on local and national commercial property websites and visible display boards being displayed at the site. Applicants should provide us with a report detailing the level of interest in the property over the 24-month period, details of any viewings and offers, and details of why any interest had not been taken forward.

**5.30** It is recognised that, in some cases, requiring 24 months marketing evidence may be counterproductive to enhancing local character if the condition of the property is such that attempting to let it would be unrealistic. In such cases, the applicant should submit a detailed report on the history and condition of the property to robustly justify why marketing evidence should not be required and that reprovided employment space as part of redevelopment would not be viable. It should also be demonstrated that the proposed development would not prejudice wider land-use objectives or the delivery of site allocations, and that reverse-sensitivity issues would not arise through conflict with surrounding existing uses, particularly where it lies within a cluster of other employment uses.

**5.31** Due to the mixed employment nature of the LELs, applicants should prove that the site or unit is unsuited to continued employment use in any form (for example, a B1 office use could not be used for light manufacturing or research and development).

### Evidence links

- Policy S.TC1: Supporting the network and hierarchy of centres

### Evidence links

- Tower Hamlets Employment Land Review (2016)
- Tower Hamlets Growth Sectors and SME Workspace Study (2016)



**Policy D.EMP4: Redevelopment within designated employment area**

1. Within the Primary Preferred Office Location (POL), redevelopment should result in an improvement and/or increase of office floorspace. Redevelopment to include residential uses will not be supported.
2. Redevelopment within the Secondary POL must be employment-led and deliver the maximum viable level of office floorspace, or other non-residential strategic functions within the Central Activities Zone (CAZ). Where residential uses are proposed these should not exceed the proportion set out in policy S.EMP 1.
3. Redevelopment within the CAZ (zone C) should be mixed-use to include office or other non-residential floorspace that supports the strategic function of the CAZ. The proportion of residential floorspace should not exceed 50% of the total floorspace within the development proposal.
4. The redevelopment of Local Employment Locations (LELs) to include non-employment uses will only be supported if the existing level of employment floorspace is re-provided on-site and where it:
  - a. is compatible with other uses proposed at the site;
  - b. provides separate access and servicing for commercial uses and residential uses
  - c. provides a range of high-quality flexible workspaces designed to meet the needs of the growing biotech cluster, research and development space, flexible workshop space and units to meet the needs of other small-to-medium enterprises and creative businesses within the Whitechapel LEL;
  - d. provides a range of units to meet the needs of small-to-medium enterprises and capable of supporting B8 uses, such as data storage, within the Blackwall LEL;

- e. provides a range of units including ground-floor units capable of accommodating 'industrial retail' within the Tower Gateway East LEL; and
  - f. provides a range of units including industrial floorspace, small-to-medium enterprise space and studios to meet the needs of creative industries within the Cambridge Heath LEL.
5. The redevelopment of Local Industrial Locations (LILs) to include non-employment uses will only be supported if the existing industrial floorspace is re-provided on-site and where:
    - a. the proposed non-employment use is compatible with existing industrial uses at the site;
    - b. the proposed non-employment use does not jeopardise the function and viability of the LIL;
    - c. provides separate access and servicing for commercial uses and residential uses; and
    - d. a range of high quality flexible working spaces are provided, meeting the needs of small-to-medium enterprises.
  6. Development which is likely to adversely impact or displace an existing business must find a suitable replacement accommodation within the borough unless it can be shown that the needs of the business are better met elsewhere.

**Explanation**

- 5.32** Part 1 of the policy reiterates that residential uses are not appropriate within the Primary POL, in accordance with the Central Activities Zone Supplementary Planning Guidance. The Primary POL has the capacity to provide significant additional office floorspace and, as such, proposals which intensify existing sites or provide new office developments will be welcomed.
- 5.33** Parts 2 and 3 seek to strike an appropriate balance between offices, CAZ strategic uses and housing to meet future growth needs and the place-making objectives of mixed-use development. Within the Secondary POL and CAZ (zone C), any redevelopment proposals should result in

an overall increase in employment floorspace and meet the office floorspace proportions required in policy S.EMP1 (see paragraphs 5.13 and 5.14). Where development seeks to deviate from these policy requirements, applicants must provide robust justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation.

**5.34** Parts 2 and 3 seek to strike an appropriate balance between the protection of existing and provision of new office and CAZ strategic uses to meet future growth within with demand for new housing and place making objectives of delivering mixed-use development. Within the Secondary POL and CAZ (zone C), there should be an overall increase in employment floorspace as a result of any redevelopment proposal. Where there is deviation below the 75% and 50% proportions of office floorspace, applicants must provide robust justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation.

**5.35** Part 4 provides guidance as to the types of spaces that are appropriate within each LEL to maintain their function and support their individual characteristics, and should be applied on a case-by-case basis considering other proposals in the area to ensure that a mix of appropriate unit types are provided across the areas as a whole.

**5.36** It is accepted that there are opportunities to redevelop or intensify some LILs and LELs and that in some cases the introduction of residential uses may be appropriate. Parts 4 and 5 of the policy seek to strike an appropriate balance between employment and other uses (particularly housing) to ensure that the employment function of LELs and LILs is maintained. New or re-provided industrial employment units should be completed to a standard that meets the needs of industrial users (for example, a ground floor location with appropriate unit heights and direct vehicle access). The industrial uses should be the primary consideration early in the design phase.

**5.37** Where development is proposed within a LIL, appropriate justification should be provided to demonstrate that conflict between current and future industrial uses at the site would be avoided and that non-industrial

uses are compatible with the function of the site in line with the criteria set out in part 1 above. This could include appropriate sound-proofing and/or implementing separate access and servicing.

**5.38** Part 6 encourages the retention of employers and jobs in the borough. However, it is recognised that in some cases it may be beneficial for the business itself to move to another location. This part of the policy will therefore be applied flexibly on a case-by-case basis, but is applicable to all types of application that may result in business displacement and not exclusively within designated employment areas. To satisfy this policy, we will require information about how the existing business which would be displaced as a result of development would be accommodated elsewhere in the borough. If the business is to be located in an out-of-borough location, it would be necessary to demonstrate that there is no disadvantage to existing employees in terms of access; the quality and quantity of such facilities will be improved; and that a suitable site within the borough could not be found.

### Policy links

- Policy D.DH1: Delivering high quality design
- Policy S.TC1: Supporting the network and hierarchy of centres
- Policy D.TR2: Impacts on the transport network

### Evidence links

- Tower Hamlets Employment Land Review (2016)
- Central Activities Zone Supplementary Planning Guidance (GLA, 2016).

## Chapter 6: Revitalising our town centres

### Introduction

- 6.1 Town centres form an important part of the borough’s distinct identity and character, acting as anchors for local neighbourhoods with a mix of uses and activities that draw our diverse communities together. The nature of our town centres continue to change and evolve – they are increasingly becoming hubs for leisure, social and community activities, not just for shopping. They also provide significant opportunities for employment and housing, particularly on upper floors. Additionally, across the borough, there are other areas of commercial, leisure and retail activity (including individual stand-alone units) which have a role in supporting the borough’s needs.
- 6.2 These policies seek to ensure that our town centres remain vibrant and sustainable while continuing to meet the needs of the people that use them. They also underpin the Council’s Strategic Mission as set out in

the Tower Hamlets Town Centre Strategy 2017 to 2022 to “create places that are at the heart of the community, celebrate local heritage and improve health and well-being” and to “improve the attractiveness, appeal and ease of use to make each of our Town Centres more in tune with the shopping and leisure needs of local residents and other visiting consumers”<sup>(45)</sup>.

### 6.3 This section contains the following policies.

- Policy S.TC1: Supporting the network and hierarchy of centres
- Policy D.TC2: Retail in our town centres
- Policy D.TC3: Retail outside our town centres
- Policy D.TC4: Financial and professional services
- Policy D.TC5: Food, drink, entertainment and the night-time economy
- Policy D.TC6: Short-stay accommodation
- Policy D.TC7: Markets

#### Policy S.TC1: Supporting the network and hierarchy of centres

1. Development is required to support the role and function of the borough’s town centre hierarchy and the provision of town centre uses in line with the principles set out below.

Tier	Location	Functions / roles
<b>Central Activities Zone</b>	Refer to the Policies Map	Apply the London Plan’s approach to development within the Central Activities Zone.
<b>Major Centre</b>	Canary Wharf	Provide a high proportion of comparison retail compared to convenience along with leisure and civic uses.  Continue to support its role as a key global employment centre.  Improve local accessibility to Canary Wharf and its strategic transport interchange, and legibility and way-finding across the area.

Tier	Location	Functions / roles
<b>Tower Hamlets Activity Areas</b>	Refer to the Policies Map	<p>Provide areas of transition between the scale, activity and character of the Central Activities Zone and Canary Wharf Major Centre and their surrounding areas.</p> <p>Support a mix of uses which make a positive contribution to health and well-being.</p> <p>Promote active uses at ground floor level.</p>
<b>District Centres</b>	<p>Bethnal Green Road</p> <p>Brick Lane</p> <p>Chrip Street</p> <p>Crossharbour</p> <p>Roman Road East</p> <p>Roman Road West</p> <p>Watney Market</p> <p>Whitechapel</p>	<p>Promote as vibrant hubs containing a wide range of shops, services and employment.</p> <p>Direct a new civic centre for the borough to Whitechapel District Centre in line with the Whitechapel Vision Masterplan Supplementary Planning Document.</p>
<b>Neighbourhood Centres</b>	<p>Aberfeldy Street</p> <p>Barkantine Estate</p> <p>Ben Jonson Road</p> <p>Burdett Road South</p> <p>Cambridge Heath</p> <p>Columbia Road</p> <p>Devons Road</p> <p>Limehouse</p>	<p>Provide a range of shops and services to meet the needs of their local catchments.</p> <p>Support the specialist functions that exist within Redchurch Street and Columbia Road Neighbourhood Centres to continue providing vibrant shopping and leisure destinations which attract visitors to the borough.</p> <p>Ensure development is appropriate to the nature and scale of each individual centre</p>

Tier	Location	Functions / roles
	London City Island Mile End Poplar High Street Redchurch Street Salmon Lane South Quay Stroudley Walk Stepney Green Thomas More Wapping Lane	
<b>Neighbourhood Parades</b>	Bow Road Burslem Street Cambridge Heath Road Caspian Wharf Castalia Square Cleveland Way Manchester Road Mile End Road Old Ford Road St Leonards Street	Ensure that Neighbourhood Parades meet the needs of their local catchments and compliment the role of other centres further up the hierarchy.

Tier	Location	Functions / roles
	St Pauls Way Westferry Road West India Dock Road/Pennyfields	

2. New development within the Central Activities Zone, Tower Hamlets Activity Areas and designated Major, District and Neighbourhood Centres will be expected to support the delivery of new retail and leisure floorspace to meet identified needs.
3. New development must contribute positively to the function, vitality and viability of the Major Centre, District Centres and the Columbia Road and Redchurch Street Neighbourhood Centres. New development within other Neighbourhood Centres and Neighbourhood Parades must ensure sufficient provision of local shops and services to meet the day-to-day needs of local communities.
4. The scale and type of development within town centres should reflect the character, scale and role of each town centre through:
  - a. ensuring town centres are accessible, active, well-used and safe during the day and night;
  - b. encouraging evening and night time economy uses that contribute to inclusiveness, economic vitality and viability and complement existing activities, where appropriate
  - c. promoting mixed-use and multi-purpose town centres with a mix of unit sizes and types to assist in the creation of vibrant centres that offer a diversity of choice, and meet the needs of local communities;
  - d. supporting multifunctional, diverse and inclusive leisure and cultural venues and promoting associated uses;
  - e. promoting and focusing markets in town centres and recognising their role in adding variety, promoting local enterprise and contributing to local character; and
  - f. supporting temporary and community uses where they help to activate and revitalise vacant town centre units and sites.

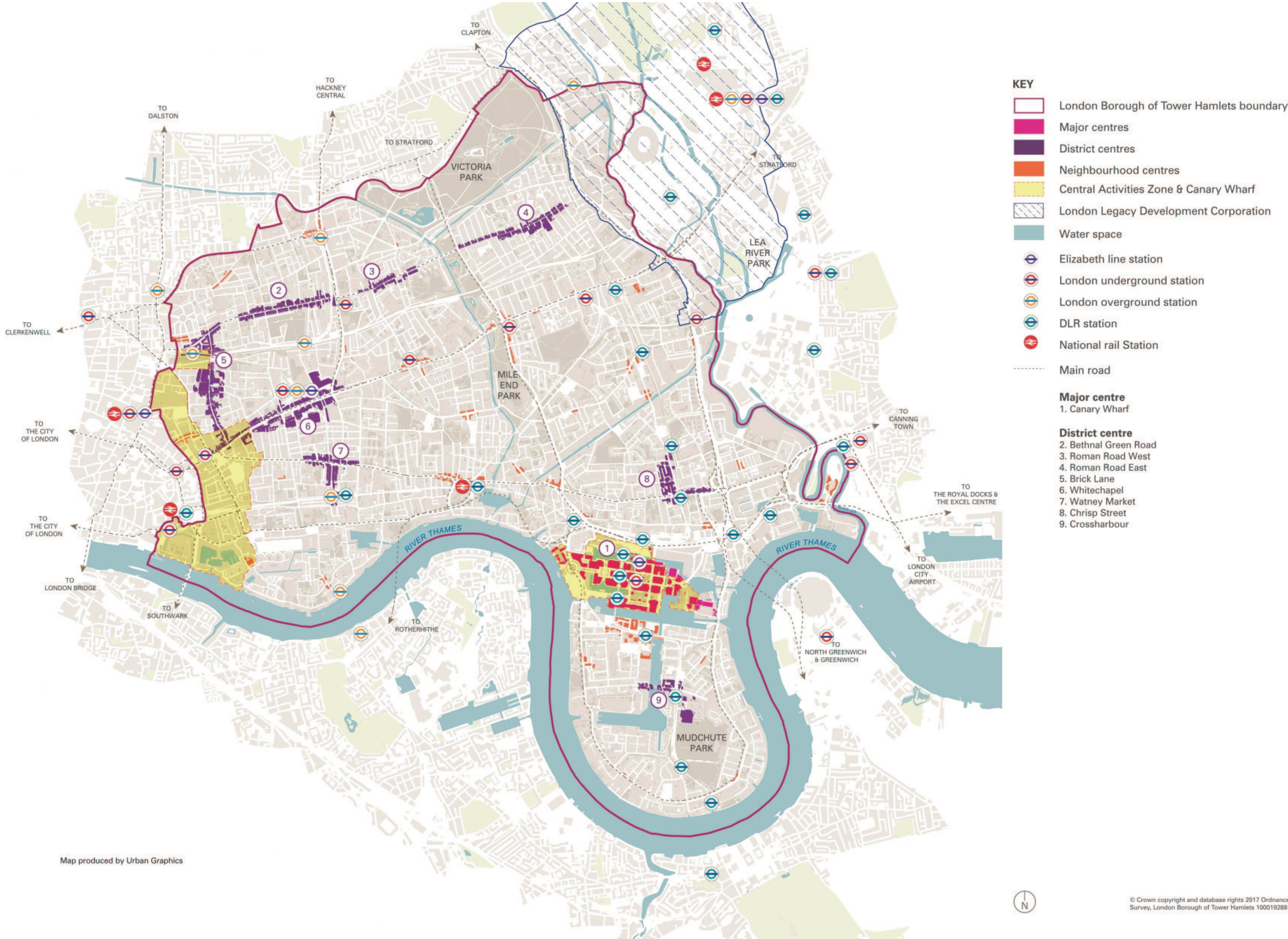
**Explanation**

**6.4** This policy defines the network of centres across the borough (as illustrated on figure 12 overleaf) and describes the role and function of each centre and how they will continue to serve the needs of the borough and the wider area. The boundaries of these centres are shown on the Policies Map.

**6.5** Development within these centres will need to demonstrate how it accords with policies and guidance within the hierarchy as appropriate.



Figure 12 :Town centre hierarchy



Map produced by Urban Graphics

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- 6.6** The western part of the borough (as shown on figures 5 and 12) lies within the Central Activities Zone. The Central Activities Zone is the geographical, economic and administrative heart of London, one of the world’s most important financial and business centres, and contains the major employment, leisure and retail designations within London.
- 6.7** All development proposals within this zone should primarily refer to the relevant policies set out in the London Plan and the Central Activities Zone Supplementary Planning Guidance.
- 6.8** Major Centres generally contain over 50,000 square metres of retail and leisure floorspace and serve a borough-wide catchment area<sup>(46)</sup>. Development within the Major Centre of Canary Wharf would be expected to demonstrate that it contributes to the continuing growth of Canary Wharf and supports its role as an important centre for international business and finance within the Primary and Secondary Preferred Office Locations, as well as its emerging residential neighbourhood at Wood Wharf.
- 6.9** Canary Wharf is already fulfilling the role of a metropolitan centre because it serves a wide catchment area, extending over several boroughs and into parts of the wider south east region. It contains over 100,000 square metres of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods as well as significant employment, service and leisure functions. This policy sets guidelines to help facilitate and support the re-designation of Canary Wharf as a metropolitan centre.
- 6.10** The Tower Hamlets Activity Areas (as shown on the Policies Map) are specific areas bordering the Central Activities Zone and the Major Centre of Canary Wharf where the scale, continuity and intensity of town centre activity and land use is different to that found across the rest of the borough. Within the Tower Hamlets Activity Areas, applicants will be expected to demonstrate how the proposals will enhance movement and connectivity to and through the designation, in particular improving links between Canary Wharf and surrounding areas to the north and south.
- 6.11** Where the proposed site is outside of a designated town centre boundary, applications should include assessments of the mix of uses within a reasonable surrounding radius, outlining how the proposed use would contribute to and support the area’s function to avoid over-concentrations of uses.
- 6.12** District Centres (as shown on the Policies Map) generally meet more local needs, with catchments of around 800 metres and provision of convenience goods and services. Typically, they contain around 10,000-50,000 square metres of retail, leisure and service floorspace, and often have specialist functions. They have high levels of accessibility. They are also generally suitable locations for housing and employment.
- 6.13** While Whitechapel currently has the status of a District Centre, the opening of the Elizabeth line and the emergence of a nationally important high-tech and bio-science cluster means it has the potential to be re-designated as a Major Centre before the end of the plan period. Such growth in Whitechapel to enable re-designation would include delivery of a new civic centre, additional employment and retail space and public realm improvements, with a relatively high proportion of comparison goods relative to convenience goods. Each year, we will monitor the development of the Canary Wharf and Whitechapel town centres over the course of the plan period to provide evidence to inform future reviews of the London Plan.
- 6.14** Neighbourhood Centres (as shown on the Policies Map) contain clusters of retail and services to meet the needs of a more local catchment and typically contain at least sixteen units. Units are predominantly small-in-scale, with convenience supermarkets of around 500 square metres tending to be the largest occupants. Larger neighbourhood centres may also have particular specialist functions, and can be appropriate for some leisure and night-time economy uses. Three new neighbourhood centres have been identified at the following locations: Burdett Road South, London City Island and South Quay, whose designation reflects existing mixed-use activity and/or responds to recent developments and anticipated population growth. In particular, the designation of South Quay reflects the aspiration within the South Quay Masterplan Supplementary Planning Document to create a ‘high street’

46 The Central Activities Zone, Major Centres and District Centres are defined in the London Plan (GLA, 2016).



environment along Marsh Wall, with an enhanced convenience offer and other local services to meet the immediate needs of residents. Such provision would complement rather than compete with the adjacent major centre at Canary Wharf.

**6.15** Columbia Road and Redchurch Street have individual characteristics in comparison to other neighbourhood centres that have emerged in recent years, with a growth in specialist retail along with some leisure provision. As such, development proposals within those designations will be subject to additional requirements in comparison to other neighbourhood centres and these are set out in subsequent policies to help maintain their uniqueness and appeal.

**6.16** Table 4 below provides a breakdown of the retail floorspace capacity requirements across the different tiers of centre during the plan period.

Table 4 :Proportion of new retail floorspace required

Tier of centre	Type of goods	Amount of floorspace (square metres) <sup>(47)</sup>
Major and District Centres	Convenience	4,061
	Comparison	4,627
Neighbourhood Centres	Convenience	2,033
	Comparison	1,963

**6.17** Where new retail or leisure floorspace is proposed beyond those figures, the applicant will be expected to demonstrate that a demand does exist for such floorspace and that it would not detrimentally harm the viability and vitality of existing floorspace in the centre and nearby town centres (see part 2).

**6.18** Where new development or change of use is proposed within designated town centres, applicants should demonstrate through an assessment of the designated centre that the resulting mix of uses is sufficient to allow the centre to continue to meet the needs of nearby communities and that change of use would not lead to the undermining of the designated centre or parade. New development should also help to meet the principles set out in part 4 to ensure that our town centres remain vibrant and attractive.

**Policy links**

- Policy S.DH1: Delivering high quality design
- Policy S.EMP1: Creating investment and jobs
- Policy S.CF1: Supporting community facilities
- Policy D.CF3: New and enhanced community facilities

**Evidence links**

- Tower Hamlets Town Centre Retail Capacity Study (2016)
- Town Centres Supplementary Planning Guidance (GLA, 2014)

47 Town Centre Retail Capacity Study (Carter Jonas, 2016)

## Policy D.TC2: Protecting retail in our town centres

1. Within the Primary Frontages of the District Centres and within the Columbia Road and Redchurch Street Neighbourhood Centres, as shown on the Policies Map, development will be expected to:
  - a. contribute to achieving a minimum of 60% of ground floor units as A1 (retail) use; and
  - b. contribute to the activity and vitality of the town centre by offering space to meet and relax, subject to A1 (retail) units not falling below the threshold set out above.
2. Development will not be supported where it would have a negative or potentially negative impact on the vitality and viability of Primary Frontages and Columbia Road and Redchurch Street Neighbourhood Centres as well as the health and well-being of local people.
3. Within the Secondary Frontages, development will be expected to:
  - a. ensure the proportion of ground floor units within A1 (retail) use does not fall below 40% of the total number of units within the Secondary Frontage; and
  - b. support a broad range of non-retail commercial and community uses which support the overall function of the town centre.
4. Outside of the Primary and Secondary Frontages within the District Centres, uses that do not require high levels of footfall (e.g. offices) and supporting town centre functions will be supported.
5. Within Neighbourhood Centres (except Columbia Road and Redchurch Street) and Neighbourhood Parades, the proportion of units within A1 retail use must not fall below 40% of all units within the designated centre. New development should also be appropriate to the nature and scale of the individual Neighbourhood Centre/Parade.
6. Where the loss of A1 retail units is proposed within the boundary of a town centre, it must demonstrate that:
  - a. the loss of the A1 units would not result in the overall level of A1 units falling below the proportions set out within policy D.TC2 (see parts 1, 2 and 4); and
  - b. the shop has been vacant for a period of more than 12 months and robust evidence of efforts made to market the shop over that period at an appropriate rent (providing three comparable shop unit rents within the town centre) is provided.
7. Where a reduction of A1 retail floorspace is proposed within any town centre, development must demonstrate that:
  - a. where there is sub-division of a large unit, the new units are of a size and scale conducive to supporting the role and function of their surroundings;
  - b. within Primary Frontages and the Columbia Road and Redchurch Street Neighbourhood Centres, any loss of floorspace is of a scale that will not materially alter the nature of the unit, its future viability and the function of the host shopping area; and
  - c. outside of Primary Frontages and the Columbia Road and Redchurch Street Neighbourhood Centres, robust evidence is provided demonstrating the existing level of floorspace genuinely cannot be maintained and that appropriate height, width and depth of floorspace would remain for town centre uses.

### Explanation

- 6.19** This policy identifies a series of Primary and Secondary Frontages within the Major and District Centres (as shown on the Policies Map) to better allow identification of the primary shopping areas within them and support the vitality and viability of the town centres.
- 6.20** Where comprehensive redevelopment alters the layout of existing town centres, proposals to change the use of a retail unit within the redeveloped town centre will be assessed based on the character and mix of uses of the surroundings within the redeveloped site.

- 6.21** A minimum of 60% of units within the Primary Frontages and 40% of units within the Secondary Frontages should be within A1 retail use. Due to their unique nature and characteristics, the minimum 60% figure must also be applied to Columbia Road and Redchurch Street Neighbourhood Centres to promote and maintain the specialist function of those areas. This will ensure that retail remains the dominant use within these areas and core function of the town centre to reinforce its vitality, viability and attractiveness. The Primary Frontages (see part 1) will have the highest levels of activity and footfall. As such, it is also appropriate to locate uses to these areas which enhance the character and attractiveness of the town centre as a place to visit, such as cafés, restaurants and drinking establishments. Other uses would be appropriate on upper floors within the Primary Frontages, such as offices, gyms or residential uses. However, access to upper levels must be designed to promote street-level activity and not undermine the viability of ground-level units.
- 6.22** Within the Secondary Frontages, a wider mix of uses (e.g. financial and professional services, community and leisure facilities) which contribute to the vitality and vitality of the town centre will be supported. On this basis, a lower minimum retail threshold will be appropriate. However, it would not be appropriate to allow the clustering of non-retail uses where it would have negative impacts on the health and well-being of the town centre within these or any other locations.
- 6.23** Undesignated frontages are areas within the District Centres (see part 3) that contribute to the overall offer of the centre but perform a more tertiary function (e.g. small offices, wholesalers and market storage) or community functions with little or no retail use.
- 6.24** Frontages have not been designated within the Canary Wharf Major Centre. This is because it is a predominantly undercover shopping complex in single, private ownership that functions differently to other town centres in the borough.
- 6.25** A minimum proportion of 40% of units within Neighbourhood Centres (excluding Columbia Road and Redchurch Street) and Neighbourhood Parades should be within A1 retail use.
- 6.26** As part of the planning application process, applicants are advised to undertake surveys (e.g. vacancy rates) to justify that changes of use would not result in the proportions of A1 units within the Primary and Secondary Frontages falling below the proportions set out in the policy above. To address part 4 of the policy, it should be demonstrated that continued A1 retail use is genuinely unviable. Applicants should also outline where and how marketing has been undertaken, having regard to our guidance on marketing which will be regularly updated. For instance, marketing activity must include evidence that the asking rent has been set at a realistic rate and the site has been advertised on national commercial and retail property websites. Developments should utilise the most recent information available to justify changes of use from A1 retail use within the Primary and Secondary frontages to accord with the minimum percentage figures set out in parts 1, 2 and 4. We will regularly monitor the mix of uses within the borough's designated town centres through the Annual Monitoring Report (a monitoring framework is included within section 5).
- 6.27** In relation to part 5, the loss of A1 (retail) refers to loss of units as well as any reduction in floorspace (e.g. where ancillary uses are converted to other uses or the host building is redeveloped). Frontages are calculated as a whole across the centre, not within individual stretches of units.
- 6.28** The design, accessibility and layout of town centres will have an important impact upon their success, and in turn the health and wellbeing of local people. This policy seeks to promote a range of unit sizes and types within each centre to meet the needs of different users and occupants. In relation to part 6 (a), applicants need to demonstrate that development proposals would not lead to an over-supply of particular unit types which confirms that there is a range of unit types across the wider town centre and that there is a need for the size and type of unit being proposed. In addition, the Transport for London's healthy streets principles should be applied to the design, accessibility and layout of town centres in order to ensure they remain attractive and competitive.
- 6.29** Whilst the changing nature of town centres and consumer demands may mean less need and demand for retail space in some locations, the requirements set out in the policy where loss of retail (A1 use) is

proposed ensures that any loss will need to be clearly justified (e.g. where units are too large to let as a single entity; therefore sub-division would increase attractiveness to potential occupants).

**6.30** However, it is acknowledged that there may be instances where some loss of floorspace within the Primary Frontages contributes to achieving wider objectives, such as the redevelopment of the site or improving access to upper levels. In such cases, street-level retail units should remain of a size and scale that is viable to current or future occupants and that access to upper levels has been designed so as to not undermine the activity and function of the Primary Frontage. In order to satisfy part 6 above, applicants will need to provide examples of other retail units of similar proposed size and layout in the area which are occupied and the types of occupants that such units attract. Information on the local market should also be submitted, including details of retailer demands and lettings in the local area to ensure that development does not result in 'token' retail units being created that are too small for the requirements of occupants.

### Policy links

- Policy S.DH1: Delivering high quality design
- Policy D.DH9: Shopfronts
- Policy D.DH10: Advertisements, hoardings and signage
- Policy S.EMP1: Creating investment and jobs

### Evidence links

- Tower Hamlets Town Centre Retail Capacity Study (2016)
- Town Centres Supplementary Planning Guidance (GLA, 2014)

### Policy TC3: Retail outside our town centres

1. Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment locations, transport interchanges and accessible locations along major routes and only supported where:
  - a. individual units do not exceed 200 square metres;
  - b. shop-fronts are well integrated into their surroundings and are implemented upon completion of the development; and
  - c. the role of nearby town centres is not undermined.
2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same criteria and additionally:
  - a. demonstrates local need that cannot be met within an existing designated centre; and
  - b. does not affect amenity or detract from the character of the area.
3. Development resulting in the loss of A1 retail shops outside of the town centre hierarchy will only be supported where:
  - a. the shop is within a 300 metres walking distance of the nearest alternative A1 shops;
  - b. the shop has been vacant for a period of more than 12 months and robust evidence is provided of efforts made to market the shop unit over that period at an appropriate rent (providing examples of three comparable shop unit rents within the vicinity); or
  - c. the site is unsuitable for continued retail use due to its accessibility, size or condition and there is no viable prospect of a retail use on the site, taking account of the projected residential growth in the vicinity and future need for provision of local shops as part of a sustainable neighbourhood.

**Explanation**

- 6.31** New retail development will continue to be directed towards existing centres in accordance with the sequential approach set out in the National Planning Policy Framework. However, this policy recognises that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas.
- 6.32** Part 1 outlines the preferred locations for retail development outside of the borough's town centres: designated employment locations (as defined in policy S.TC1) and main routes (i.e. A roads and other roads along the strategic transport network where it can be demonstrated that there is a high level of footfall, accessibility and visibility).
- 6.33** In other locations, development proposals will also be expected to demonstrate there is a lack of capacity within the designated town centres (for example, showing low levels of vacancy within nearby designated town centres) and there will be no detrimental impact on the character of the area (see part 2).
- 6.34** Size limits on retail units outside of town centres have been defined to ensure that A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map) in line with the 'town centre first' approach set out in government guidance.
- 6.35** This policy also seeks to ensure that shopfronts enhance the attractiveness of the unit to potential occupants and improve the overall visual appearance of the area.
- 6.36** Part 3 contains a general presumption against the loss of retail space outside of town centres. However, in certain circumstances, such losses may be justified. Applicants should outline where and how marketing has been undertaken, including evidence of advertising on national commercial and retail property websites and a realistic asking rent. However, it is recognised that in some cases requiring marketing evidence may be counterproductive to enhancing local character if the condition of the property is such that attempting to let it would be

unrealistic. In such cases, the applicant should submit a detailed report on the history and condition of the property to robustly justify why marketing evidence should not be required and that re-provided retail space as part of redevelopment would not be viable at the location.

**Policy links**

- Policy S.EMP1: Creating investment and jobs
- Policy D.DH9: Shopfronts

**Evidence links**

- Tower Hamlets Town Centre Retail Capacity Study (2016)

## Policy D.TC4: Financial and Professional Services

1. Outside of the borough's town centres, financial and professional services uses will be supported where they are local in scale and there is a reasonable prospect of the unit being occupied.
2. Payday loan shops will only be permitted in the Central Activities Zone, Major Centre, Tower Hamlets Activity Areas and secondary frontages of the District Centres providing there would not be an over concentration of similar businesses.

### Explanation

- 6.37** Part 1 of the policy seeks to guide the location and scale of uses within the A2 use class (financial and professional services). Such uses are appropriate both inside and outside of the borough's town centres, although within out-of-town-centre locations, adequate information must be submitted to demonstrate that the anticipated asking rents/purchase price of the space would be appropriate to the location (taking account of our indicative figures) or that a suitable occupier has been secured.
- 6.38** Under part 2 of the policy, applicants proposing new payday loan shops will need to submit details of other businesses within the designated town centre (or within a radius of 400 metres where located within the Tower Hamlets Activity Areas or Central Activities Zone) and where such businesses are located in relation to the proposed site demonstrating that the proposal would not give rise to a clustering which could undermine the vitality of the host centre and negatively impact on the well-being of local people.

### Policy links

- Policy D.SG3: Health impact assessments
- Policy S.EMP1: Creating investment and jobs

### Evidence links

- Tower Hamlets Town Centre Retail Capacity Study (2016)
- Town Centres Supplementary Planning Guidance (GLA, 2014)



**Policy D.TC5: Food, drink, entertainment and the night-time economy**

1. Cafés, restaurants and drinking establishments (use classes A3, A4 and AA) will be supported within the Central Activities Zone, Major Centre, Tower Hamlets Activity Areas, District Centres and Neighbourhood Centres (as shown on the Policies Map) provided that:
  - a. it can be demonstrated that the overall vitality and viability of the town centre would be enhanced; and
  - b. where proposed within Primary or Secondary Frontages, the proportion of A1 (retail) units would not fall below the levels set out in policies D.TC4 and D.TC5.
2. Cafés/restaurants and drinking establishments (use classes A3 and A4) in Neighbourhood Parades and outside of the town centre hierarchy will only be supported provided that they meet the following criteria.
  - a. Cafés and restaurants (A3 uses) can demonstrate that the proposal would support surrounding uses and would not undermine the function of nearby town centres, or form part of a concentration of uses that would cumulatively cause harm to the viability of the borough's town centres.
  - b. Drinking establishments (A4 and AA uses) will only be permitted where they are local in nature and scale.
3. Development of hot food takeaways (use class A5) will only be supported within the Central Activities Zone, Tower Hamlets Activity Areas, Secondary Frontages of District Centres, Neighbourhood Centres or Neighbourhood Parades where they meet the following criteria.
  - a. There must be a separation of at least four non-A5 units between each new hot food takeaway unit.
  - b. The percentage of A5 units would not exceed 5% of the total number of units within Major, District or Neighbourhood Centres.
    - c. Within Neighbourhood Parades there would be no more than one A5 unit.
    - d. The proposal is not within 200 metres walking distance from an existing (or proposed) school and/or a local authority leisure centre.
    - e. The proposal will not harm the amenity of surrounding properties.
4. New betting offices/shops will only be supported within the Central Activities Zone, Tower Hamlets Activity Areas or Secondary Frontages within Major and District Centres; new amusement centres, casinos and lap-dancing clubs will only be supported within the Central Activities Zone, Tower Hamlets Activity Areas or Major Centre. Such uses will be resisted where:
  - a. there is an over concentration of such uses which could give rise to negative cumulative social impacts;
  - b. the site is in close proximity to a school or sensitive community, cultural or social facilities; and
  - c. the proposal would detrimentally impact the amenity and character of the area.
5. Development of entertainment venues within the D2 or sui generis use classes not referenced in policy D.TC5 will be:
  - a. directed to the Central Activities Zone, Tower Hamlet Activity Areas, Canary Wharf Major Centre and the other designated town centres (except Neighbourhood Parades) where they are compatible with other uses within the town centre; and
  - b. only permitted within Neighbourhood Parades or non-designated locations where:
    - i. it can be demonstrated that such uses will not result in adverse impacts on the amenity of the surrounding area;
    - ii. the location has good public transport accessibility; and
    - iii. existing venues in designated town centres would not be undermined.

## Explanation

- 6.39** The nature of town centres continues to evolve away from traditional shopping towards leisure and entertainment activities such as cafés, restaurants and drinking establishments (A3 and A4 uses). Such uses have become important in preventing and reducing vacancy in town centres. They can also help to increase activity in town centres outside of traditional shopping hours, thus contributing to town centre vitality and a greater perception of safety from increased natural surveillance.
- 6.40** Within the Primary Frontages of the Major and District Centres and the Columbia Road and Redchurch Street Neighbourhood Centres, as shown on the Policies Map, new A3 and A4 uses can be supported where the overall proportion of A1 retail does not fall below 60% of all units. Therefore, where change of use is proposed in those areas, applicants should provide a town centre survey outlining that an appropriate level of A1 retail is being maintained to ensure the vitality and viability of the area as the primary shopping area. Within Secondary Frontages in the District Centres and Neighbourhood Centres, applicants should demonstrate that the overall mix of uses would be conducive to the future vitality and viability of the town centre. Within the Central Activities Zone and Tower Hamlets Activity Areas, proposals involving new A3 and A4 uses will be managed on a case-by-case basis, with the onus on applicants to demonstrate there would not be an over-concentration of similar uses within the surrounding area.
- 6.41** We recognise that, in some instances, it may be appropriate and desirable to locate A3 and A4 uses within Neighbourhood Parades or outside of designated town centres, Tower Hamlets Activity Areas and the Central Activities Zone, although robust justification must be provided (see part 2). Examples might include facilities that enhance the enjoyment of open spaces and water spaces; serve transport interchanges or serve out-of-town-centre employment areas. For instance, new or replacement community pubs will be sought to meet local needs in locations where an existing public house may have been lost to redevelopment.
- 6.42** Within Neighbourhood Parades and non-designated locations, proposals involving A3 and A4 uses should be of a more modest scale than might be expected in larger town centres. Applicants should robustly state why

a café, restaurant or drinking establishment would be appropriate in such a location. Details of any other cafés, restaurants or drinking establishments in the local area should also be provided to mitigate the risk of clusters developing that could undermine nearby town centres. In respect of drinking establishments, a detailed management plan should be submitted alongside the planning application confirming that it will be run as a 'community' public house and that conflicts with neighbouring properties would be avoided. Applicants would also be encouraged to consider our statement of licensing policy.

- 6.43** In order to satisfy part 3, planning applications will be expected to include information (including town centre surveys) in order to ensure that any provision of new hot food takeaways would not exceed the levels set out in parts b-c.
- 6.44** In order to satisfy part 4, applicants should outline details of other such premises within the local area to demonstrate that there would not be a clustering or over-concentration of such businesses. Please note: sensitive community, cultural or social facilities include but are not limited to places of worship and centres or refuges for the treatment of people with addictions.
- 6.45** Part 5 seeks to guide the location of leisure and entertainment venues. In certain circumstances, such uses would be preferable outside of town centres due to the impact on surrounding amenity through noise or the negative impact on town centre appearance resulting from inactive frontages or requirements for space.

### Policy links

- Policy D.SG3: Health impact assessments
- Policy S.DH1: Delivering high quality design
- Policy D.DH8: Amenity
- Policy D.ES9: Noise and vibration



**Evidence links**

- Tower Hamlets Town Centre Retail Capacity Study (2016)
- Town Centres Supplementary Planning Guidance (GLA, 2014)
- Takeaway Toolkit (GLA, 2012)

**Policy D.TC6: Short-stay accommodation**

1. Development of visitor accommodation will be supported in locations within the Central Activities Zone, Canary Wharf (Major Centre), Tower Hamlets Activity Areas and District Centres (as shown on the Policies Map) or along primary routes where adjacent to transport interchanges, providing:
  - a. the size, scale and nature of the proposal is proportionate to its location;
  - b. a need for such accommodation can be demonstrated, taking account of other proposals and unimplemented consents in the local area;
  - c. it does not compromise the supply of land for new homes or jobs and our ability to meet the borough's housing and employment targets; and
  - d. the applicant can demonstrate adequate access and servicing arrangements appropriate to the scale, nature and location of the proposal.
2. Applications for serviced apartments must demonstrate that they meet the criteria stated in part 1 above and will be managed appropriately as short-term accommodation (up to 90 days).

**Explanation**

- 6.46** For the purposes of this policy, visitor accommodation refers to provision within the C1 use class, such as hotels, bed and breakfasts, traveller hostels, serviced apartments and self-catering apartments. This policy seeks to steer visitor accommodation towards the Central Activities Zone, Activity Areas, borough's district town centres, or along primary routes (e.g. A-roads) where they are adjacent to transport interchanges (such as Docklands Light Railway/railway/underground/bus stations).

**6.47** Short stay accommodation schemes should be of a size that reflects its surrounding built environment and reflects the function of the location within designated town centres or employment areas. For example, a large-scale hotel that is appropriate in the Major Centre of Canary Wharf may not be suitable within a smaller District Centre.

**6.48** This policy applies a flexible approach to the assessment of new visitor accommodation. This recognises the different markets that various forms of visitor accommodation may serve, and the way in which customers and service vehicles may access such accommodation. For example, traveller hostels, budget hotels and small boutique hotels are less likely to require significant space for coaches and other vehicles setting down and picking up movements as customers are more likely to arrive via public transport.

**6.49** Developers and applicants will need to submit information detailing how customers would access the accommodation (for example, whether this would be mostly utilising existing public transport provision and if not there is appropriate provision for vehicles setting down or picking up). This would also apply to any vehicles required to service the accommodation (for example to handle laundry and deliver other supplies to the accommodation). It should be demonstrated that such movements would not create unacceptable impacts on residential amenity or highway safety in accordance with policies D.DH7 and D.TR2.

**6.50** For serviced apartments, development will be required to provide the following details.

- Management will ensure rooms will not be occupied for periods of 90 days or more.
- Management will provide twenty-four hour servicing.
- Telephone lines will be provided in the rooms with no opportunity for personal lines installed by the occupier.
- Management will ensure rooms will be charged out at a maximum at weekly rates.
- The use will be secured in the form of a licence, not a lease.
- The occupants of the room will not have exclusive possession of the room.
- Management will have access to the room.

## Policy links

- Policy S.DH1: Delivering high quality design
- Policy D.DH8: Amenity
- Policy S.EMP1: Creating investment and jobs
- Policy D.TR2: Impacts on the transport network

## Evidence links

- Tower Hamlets Town Centre Retail Capacity Study (2016)

**Policy D.TC7: Markets**

1. Development proposals impacting existing markets will only be supported where:
  - a. they demonstrate that the overall quality of the market and public realm will be improved;
  - b. the capacity for existing numbers of pitches is maintained; and
  - c. they protect or re-provide appropriate storage and servicing facilities.
2. Proposals for new markets, including farmers markets and 'street-food' markets, will be encouraged. They will be directed to town centres and should enhance the centre's existing offer and contribute to vitality and cohesion.
3. Proposals for new markets outside of town centres will only be supported where they:
  - a. are temporary in nature;
  - b. bring vacant sites back into use;
  - c. do not undermine the borough's existing markets and town centres; and
  - d. do not cause unreasonable harm to the amenity of surrounding properties, particularly where evening and night-time markets are proposed.

**Explanation**

- 6.51** It is widely recognised that markets act as magnets to create interest and draw people into town centres and support footfall which benefits other businesses. They can also act as incubation space for new ideas and small-to-medium enterprises. This policy aims to protect the borough's existing markets and ensure that new development does not undermine their future role and function (for example, ensuring that storage facilities are maintained).

- 6.52** While new markets within town centres are favoured, this policy also recognises that there may be opportunities for markets outside of town centres where they activate vacant spaces.
- 6.53** Applicants and developers should work with our markets team at the earliest opportunity so that information can be provided with the planning application to show that sufficient space will be safeguarded to meet the needs of traders in terms of servicing and storage. Proposals should also detail how the types of goods and services proposed would complement rather than compete with surrounding town centres, as well as how they could contribute to other priorities such as improving access to healthy, affordable food. In addition, a written management and design strategy should be provided which outlines how the proposal will avoid causing negative impacts on markets, such as congestion on footpaths and roads, litter, poor refuse storage and noise.
- 6.54** Where proposals seek to re-activate vacant spaces or empty shops, temporary permissions will be favoured. Applicants should demonstrate that the proposed market will have a different offer to nearby town centres to avoid undermining them. They should also demonstrate that noise impacts will be mitigated to protect the amenity of surrounding properties, especially housing.

**Policy links**

- Policy D.DH8: Amenity

**Evidence links**

- Tower Hamlets Town Centre Retail Capacity Study (2016)
- Town Centres Supplementary Planning Guidance (GLA, 2014)

## Chapter 7: Supporting community facilities

### Introduction

- 7.1** Tower Hamlets has a range of community facilities such as health, social, education, leisure and sport facilities providing valuable services to both local communities and visitors. The provision of these essential community facilities plays a vital role in creating and sustaining liveable neighbourhoods through providing valuable services.
- 7.2** Community facilities are facing increased pressure from higher land value uses, such as housing and employment, in the face of limited public funding and a fast-growing resident and worker population. Specific need gaps and priorities include the provision of public houses, youth centres, local presence facilities/Idea Stores, indoor sport facilities and community halls.
- 7.3** These policies will seek to promote and facilitate the delivery of essential community facilities through new development (including changes of use, extensions and new builds) in line with the Infrastructure Delivery Plan, which outlines the existing capacity and future needs and priorities facing some of the community facilities in the borough. In particular, they aim to ensure that sufficient facilities are provided to meet the needs of the borough's growing population in the areas of greatest need and growth, as described in section 4.
- 7.4** This section contains the following policies.
- Policy S.CF1: Supporting community facilities
  - Policy D.CF2: Existing community facilities
  - Policy D.CF3: New and enhanced community facilities
  - Policy D.CF4: Public houses

### Policy S.CF1: Supporting community facilities

1. Development which seeks to protect existing community facilities will be supported.
2. Development will be required to contribute to the capacity, quality, usability and accessibility of existing community facilities, particularly where development will increase demand.
3. Development should maximise opportunities for the provision of high quality community facilities to serve a wide range of users. Where possible, facilities or services should be co-located or shared to encourage multi-purpose trips and better meet the needs of different groups.
4. New community facilities will be directed towards the borough's centres in accordance with the town centre hierarchy and/or to locations which are accessible to their catchments depending on the nature and scale of the proposal.

### Explanation

- 7.5** This policy seeks to maintain an adequate supply and range of community facilities across the borough to serve local needs and support the creation of more liveable and sustainable places in line within the vision and objectives set out in section 2.
- 7.6** For the purpose of this policy, community facilities include a range of social infrastructure that provide services to the community such as:
- indoor sports and leisure facilities (e.g. leisure centres and swimming pools);
  - health facilities (e.g. hospitals and doctor surgeries);
  - cultural facilities (e.g. art galleries, museums and theatres);
  - education facilities (e.g. schools, nurseries and universities); and
  - social facilities (e.g. places of worship, libraries, Idea Stores, local presence and public houses).

- 7.7** Playing fields and outdoor sport facilities, such as multi-use games areas and tennis courts, are also important community facilities (see policies S.OWS1 and D.OWS3).
- 7.8** Part 1 sets out a presumption against the loss of community facilities to ensure that sufficient provision is available to meet local needs.
- 7.9** Part 2 promotes opportunities to create new community facilities and expand or improve the capacity and accessibility of existing facilities, taking account of future projected community needs (as set out in the Infrastructure Delivery Plan). This will be achieved through the use of planning contributions and working together with partners to ensure adequate community facilities are in place to support the sustainable growth of the borough. Improvements to community facilities may also be funded through the community infrastructure levy where this is identified on the Regulation 123 List.
- 7.10** Part 3 seeks to encourage the provision of multi-purpose and shared services which provide opportunities to co-locate or integrate a range of community uses and functions, such as community halls and sport facilities. Consideration should be given to promoting community facilities which can be easily accessed and support a wide range of users in line with the principles of active and inclusive design.
- 7.11** Part 4 seeks to ensure that community facilities are located within or at the edge of town centres in line with policies S.TC1 and S.SG1. These locations are considered to be the most accessible places in the borough and such uses contribute to the vitality and viability of town centres. In addition, new facilities will be directed towards locations which are accessible to their catchment areas.
- 7.12** This policy will be delivered in accordance with the Infrastructure Delivery Plan and other relevant strategies, including the Indoor Sports Facilities Strategy, Open Space Strategy, Green Grid Strategy and area-based masterplans. We will continue to work with key stakeholders and other service providers to ensure that new community facilities are provided at locations where there is a clearly demonstrated need.

#### Policy links

- Policy D.SG3: Health impact assessments
- Policy D.SG5: Developer contributions
- Policy S.DH1: Delivering high quality design
- Policy S.TC1: Supporting the network and hierarchy of centres
- Policy S.OWS1: Creating a network of open spaces
- Policy D.TR2: Impacts on the transport network

#### Evidence links

- Tower Hamlets Infrastructure Delivery Plan
- Tower Hamlets Indoor Sports Facilities Strategy (2017)
- Tower Hamlets Open Space Strategy (2017)
- Planning for Sport Development Management (Sport England, 2014) Active Design (Sport England, 2015)

## Policy D.CF2: Existing community facilities

1. Existing community facilities must be retained unless it can be demonstrated that:
  - a. there is no longer a need for the facility or an alternative community use within the local community; or
  - b. a replacement facility of similar nature that would better meet the needs of existing users is provided.
2. Where community facilities are re-provided on site as part of the development, the quality and accessibility of these facilities (including public access) should be enhanced.
3. Extensions to existing schools should demonstrate that:
  - a. there is a demonstrated local need; and
  - b. the current level of child play space will be enhanced and increased.

### Explanation

- 7.13** This policy seeks to protect and enhance the borough’s existing community facilities where they are still needed to adequately meet local needs.
- 7.14** Part 1 seeks to resist the loss of the borough’s valuable community facilities, except in certain circumstances (see a and b). Statements from relevant providers confirming that the existing or alternative community uses would not be needed or possible in the premises will be required. Where the loss of a community facility is justified, the applicant will need to explore the opportunity to accommodate an alternative community use which would better meet local needs, in accordance with relevant strategies, including the Indoor Sports Facilities Strategy, Open Space Strategy and Infrastructure Delivery Plan.

**7.15** We recognise that in certain circumstances site redevelopment will require the relocation of existing uses to a location where the needs of the users will be more adequately met. To ensure that there is no unacceptable disadvantage to existing users, re-provision of the community facility should be within the relevant catchment area and should result in quality and access improvements, reflecting the principles of active and inclusive design. It should also demonstrate that the quantity is at least kept at the same level as the existing facility and the aim should be to increase it. Where it is considered that a new off-site location would better meet the needs of existing users, the new facility should be provided before completion of the new development.

**7.16** Part 2 seeks to ensure that new development facilitates and promotes greater public access through good and inclusive design and signage.

**7.17** Part 3 seeks to ensure that any extension to an existing school results in an increase of existing child play space to accommodate the additional needs arising from the development, with a view to promoting shared community use in line with Sport England’s guidance.

### Policy links

- Policy D.SG3: Health impact assessments
- Policy D.SG5: Developer Contributions
- Policy S.DH1: Delivering high quality design

### Evidence links

- Tower Hamlets Infrastructure Delivery Plan (2016)
- Tower Hamlets Indoor Sports Facilities Strategy (2017)
- Tower Hamlets Open Space Strategy (2017)
- Planning for Sport Development Management (Sport England, 2014)
- Active Design (Sport England, 2015)



**Policy D.CF3: New and enhanced community facilities**

1. New community facilities located outside the borough's town centres will only be permitted where an up-to-date and robust local need can be demonstrated.
2. New community facilities within larger developments should be easily accessible to people who live and work outside of the host development.
3. Development of new early education and care facilities and primary and secondary schools which respond to local need will be supported where:
  - a. they are in locations which are accessible to the residents of their indicative catchment areas;
  - b. they can demonstrate appropriate learning spaces (including external play space) can be provided; and
  - c. the design and layout of these facilities and play space provision reflects the relevant guidance from the Department for Education and Sport England, taking account of the level of air quality and other amenity considerations.
4. New facilities will be encouraged to make relevant facilities (e.g. external recreation space, sport facilities and appropriate classroom space) accessible to the wider community outside of core hours.
5. New adult, further and higher educational facilities will be required to provide information of the relevant certification and registration details from the Department for Education and meet Sport England's design guidance and other relevant national governing bodies guidance.
6. Large-scale indoor sports and leisure facilities will be directed towards accessible locations such as town centres where there is a clearly identified need.

**Explanation**

- 7.18** This policy seeks to ensure that appropriate high quality new community facilities are provided in accessible locations throughout the borough to adequately support the growing population and meet identified needs.
- 7.19** Part 1 seeks to ensure that expansion of existing and delivery of new community facilities is directed towards accessible locations such as town centres. However, new community facilities outside of town centres will only be supported where sufficient evidence is provided to demonstrate that there is a local need not being met elsewhere in the neighbourhood. Facilities provided in these locations need to ensure that they are local in nature and scale and that there is no adverse impact on the amenity of the surrounding residents. This includes the impact of people coming and going to the facility and the impact of users within the facility when it is in use, as well as the impact on the highway network and parking facilities. Where the provision of a community facility is proposed as part of a residential development, it should be demonstrated that it is accessible to people living outside of the development and designed to be visible from the street.
- 7.20** Part 2 aims to ensure that new community facilities which form part of a wider development are designed to facilitate and encourage wider community use and do not look and feel exclusive to the occupants of the development. Consideration should be given to ensuring that the facility can be easily accessible to a wide range of users.
- 7.21** Parts 3 and 4 encourage the provision of education facilities at early years, primary and secondary level in appropriate locations, where they meet local need and demonstrate high quality and inclusive design in line with the relevant guidance from the Department for Education, Sport England and other relevant national governing bodies (for instance, suitable locations for early years could include the ground floor of residential blocks or secondary frontages in existing town centres).
- 7.22** In order to ensure that education facilities are suitably located, applicants should outline the indicative catchment area for the recruitment of pupils and assess the impact of people (including pupils, parents, carers and staff) arriving and leaving the facility as well as the impact on the highway network and parking facilities.

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**7.23** Demand for early education and care facilities will increase in the future as the borough's birth rate continues to rise. Early education and care facilities refer to places where a number of children under five years of age are brought together during part or all of a working day on a regular basis where they can play, learn and receive care (for example, primary school nurseries, children's centres, pre-school and 'wrap-around' childcare). The provision of early year facilities will contribute towards reducing the borough's current below-average levels of achieving good cognitive development at age 5 and enable greater employment rates amongst parents in line with our statutory duty to provide childcare to some 2-year-olds and all 3-and-4-year-olds. Future provision will increasingly require innovative approaches to the use of land and floor space, including the co-location of early education and care facilities with compatible uses, such as primary and secondary schools and office buildings.

**7.24** Further and higher education (see part 5) refers to the stage of education after secondary school and includes a wide range of institutions including universities and colleges (as defined in the glossary in appendix 1) which provide lifelong learning. It is noted that some further education colleges do include sixth form provision. In order to meet these requirements, the applicant will need to provide evidence of the relevant certification from the Department for Education as well as details of student and staff numbers, enrolment criteria and curriculum details. Sport and recreation facilities within schools should also reflect the principles set out in Sport England and other relevant national governing body guidance.

**7.25** Part 6 directs large-scale indoor sports and leisure facilities to accessible locations to optimise the opportunities for their public use and enjoyment, particularly where there are good links to public transport and other services.

## Policy links

- Policy D.SG3: Health impact assessments
- Policy D.SG5: Developer contributions
- Policy S.DH1: Delivering high quality design

- Policy S.TC1: Supporting the network and hierarchy of centres
- Policy S.OWS1: Creating a network of open spaces
- Policy D.TR2: Impacts on the transport network

## Evidence links

- Tower Hamlets Infrastructure Delivery Plan
- Tower Hamlets Indoor Sports Facilities Strategy (2017)
- Tower Hamlets Open Space Strategy (2017)
- Planning for Sport Development Management (Sport England)
- Active Design (Sport England, 2015)
- Building Bulletin 103: Area guidelines for mainstream schools (Department for Education, 2014)
- Baseline designs for schools: guidance (Department for Education, 2014)



**Policy D.CF4: Public Houses**

1. Where the loss of a public house is proposed, the following evidence will be required.
  - a. Evidence that all reasonable efforts have been taken to preserve the facility as a public house, including evidence of appropriate maintenance and upkeep and efforts to diversify the business.
  - b. Evidence demonstrating that the public house has been marketed for at least 12 months as a public house at a reasonable market rent and free of tie and restrictive covenant and following this exercise there has been no interest in the property and there is no realistic prospect of continuing its current use.
  - c. Marketing evidence demonstrating there has been no interest in the property for an alternative community use over a further 12-month period following the marketing period in part 1b.
2. Where a public house is replaced or re-provided, adequate floorspace must be provided to ensure the continued viability of the public house.
3. Proposals within the curtilage of a public house must demonstrate that the continued operation and viability of the public house would not be compromised. Loss of converted pubs on the grounds of viability as a result of previous development will not be supported.

**Explanation**

**7.26** Like many other London boroughs, Tower Hamlets has witnessed a significant net loss of public houses (otherwise known as pubs) since the millennium. The rate of decline has far exceeded both the London and national averages<sup>(48)</sup>. This policy therefore aims to afford greater protection to the borough's public houses and guard against their unnecessary loss.

**7.27** In order to satisfy part 1 (a), applicants seeking to demolish or replace an existing public house will need to provide evidence of appropriate maintenance and upkeep and efforts to diversify the business. Alternatively, if the property has not been appropriately maintained, we will expect this has been reflected within the asking rent or price of the pub. Details of pub accounts for current and previous trading years should also be provided.

**7.28** In order to satisfy part 1 (b), applicants will need to submit a full detailed marketing report outlining the asking price or rent for the public house and the terms on which it was offered (for example, freehold or leasehold: whether or not it included living accommodation and whether any part of the property was excluded). The report should include details of any interest in the property, viewings, and why such interest was not taken forward. This information should also be provided for a subsequent 12-month period outlining attempts to let the property for alternative community uses as described under part 1 (c).

**7.29** Part 2 seeks to avoid future examples in the borough of what are termed 'trojan horse' pubs. This term refers to developments that have met policy requirements through the re-provision of floorspace for pub use but at a level that is insufficient to be practically let as a pub, resulting in a subsequent application to convert the space to an alternative use. This part of the policy seeks to ensure that there is a genuine intention to continue pub use where redevelopment is proposed. It must also be demonstrated that appropriate soundproofing is to be installed so as to minimise conflict between the pub and any residential use. In order to satisfy this criterion, applicants should submit indicative floorplans demonstrating that, at a minimum, the proposed floorspace for pub use can support a bar area, appropriate seating, storage and toilets.

**7.30** Applicants seeking to reduce or remove outdoor space must demonstrate that the remaining space is of sufficient size and quality for the needs of pub users, and that the pub could continue to operate viably following any loss or reduction. It must also be demonstrated that any smokers displaced from such spaces would not cause unacceptable harm to the amenity of surrounding properties by gathering in alternative locations.

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**7.31** Where loss or conversion of ancillary function space or living accommodation is proposed, it must be demonstrated that the pub use would not be undermined through such loss. For the loss of function space, evidence is also required to demonstrate the availability of sufficient and suitable alternative facilities available within the local area.

## Policy links

- Policy S.DH1: Delivering high quality design
- Policy S.DH3: Heritage and the historic environment
- Policy D.ES9: Noise and vibration

## Evidence links

- Tower Hamlets Infrastructure Delivery Plan
- Pubs in Tower Hamlets – Evidence Study (2017)

## Chapter 8: Enhancing open spaces and water spaces

### Introduction

**8.1** Tower Hamlets has a number of valued open spaces and water spaces which offer many important social, environmental and economic benefits, including:

- enhancing amenity;
- contributing to healthy lifestyles through providing opportunities for active travel and leisure and recreation opportunities;
- providing meeting places for community activities and cultural events;
- helping to manage flood risk and mitigating the risks of climate change;
- enhancing biodiversity; and
- providing a cooling effect to reduce elevated urban air temperature.

**8.2** The overall provision of publicly accessible open space remains low with some parts of the borough being acutely deficient, including the Isle of Dogs, Shoreditch and Whitechapel. This equates to 0.89 hectares per 1,000 residents, which is less than the borough's open space standard of 1.2 hectares per 1,000 residents<sup>(49)</sup>.

**8.3** In a densely populated borough like Tower Hamlets facing significant development pressure, there is limited scope to provide major additional open space to accommodate the needs of the growing population, such as new parkland and woodland. Nevertheless, the borough's open spaces make a significant positive contribution to the character and appearance of the borough, reflecting their popularity among residents and visitors, relatively good condition and varied use. Some parks (e.g. Victoria Park) are nationally renowned and have been awarded Green Flag status.

**8.4** In order to meet this shortfall, it is estimated that 220 hectares of additional publicly accessible open space will be required across the borough over the period to 2031.

**8.5** As the population continues to grow there will be an increasing need to protect and revitalise our existing open spaces as well as secure additional publicly accessible open space, especially within deficient areas (see figure 14).

**8.6** Tower Hamlets has access to more water spaces than any other London borough, comprising the rivers Thames and Lea and the other connecting water spaces (e.g. Limehouse Cut, Regents Canal and Hertford Union Canal) as well as several docks and basins. However, much of the potential of the borough's water spaces remains untapped, due to fragmented public access and limited active recreation and leisure opportunities. Tower Hamlets has also experienced significant historic water loss, particularly around Shadwell Basin and the Ornamental Canal, while a considerable amount of water space has been reclaimed and re-used to frame development around West India Docks, Blackwall Basin and Poplar Dock in Canary Wharf. This has further limited the availability of water spaces for recreation, transport and other water-related activities. It has also impacted on the biodiversity of the waterways as well as the open character of our valuable water space heritage assets.

**8.7** Hence, it is important that policies protect our valuable water spaces from permanent infillings and oversailing and seek to improve their continuous public access; enhance biodiversity; promote water-related and water-dependant recreation; and ensure the delivery of high quality design to celebrate the heritage of our waterways.

**8.8** Figure 13 overleaf illustrates the existing and proposed network of well-connected publicly accessible open spaces and water spaces across the borough, drawing upon the principles set out in the All London Green Grid Supplementary Planning Document.

**8.9** This section contains the following policies.

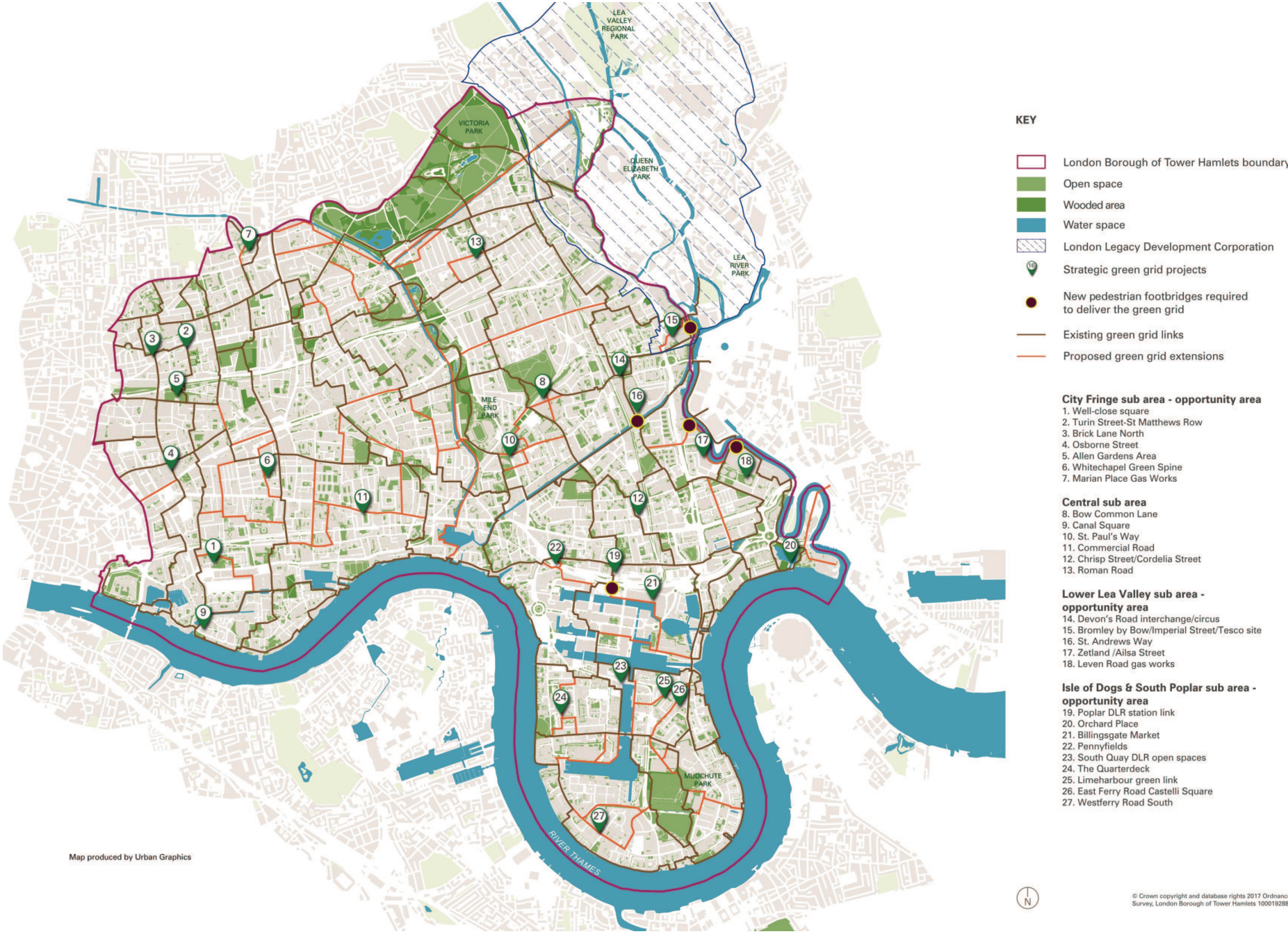
49 In particular, Tower Hamlets faces a significant shortfall in the provision of playing pitches, especially outdoor sports provision, due to the fact that most grass pitches are located at parks or areas of open space where often they serve multiple functions, such as recreational open space and non-sports related activities. These requirements are identified within the Tower Hamlets Open Space Strategy (2017).

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- Policy S.OWS1: Creating a network of open spaces
- Policy S.OWS2: Enhancing the network of water spaces
- Policy D.OWS3: Open space and green grid networks
- Policy D.OWS4: Water spaces



Figure 13 : An enhanced network of open spaces and water spaces



## Policy S.OWS1: Creating a network of open spaces

1. Proposals will be required to provide or contribute to the delivery of an improved accessible, well-connected and sustainable network of open spaces through:
  - a. protecting all existing open space to ensure that there is no net loss;
  - b. improving the quality, value and accessibility of existing publicly accessible open space across the borough and neighbouring boroughs, in line with the Green Grid Strategy, Open Space Strategy, Local Biodiversity Action Plan and Sport England’s Active Design Guidance;
  - c. delivering an improved network of green grid links in line with the Green Grid Strategy to enhance access to key destination points (town centres, community facilities and publicly accessible open spaces) and to and along waterspaces, as well as provide ecological corridors for wildlife; and
  - d. maximising the opportunities to create/increase publicly accessible open space (including playing pitches and ancillary sporting facilities) with a range of sizes and for a range of users, particularly in the following locations (which are expected to experience the highest level of open space deficiency).
    - Vernal Green
    - Blackwall & Cubitt Town
    - Bromley North
    - Bromley South
    - Canary Wharf
    - Limehouse
    - Poplar
    - Shadwell
    - Spitalfields & Banglatown
    - St Dunstan’s

- St Peter’s Weavers
- Whitechapel

- e. assisting with the delivery of enhanced new strategic publicly accessible open spaces at Lea River Park (including the Leaway) and within site allocations.

### Explanation

- 8.10** This policy seeks to protect and enhance the borough’s valuable network of open spaces as well as promote the creation of new publicly accessible open spaces which are better connected and provide a wide range of opportunities for local communities and visitors in line with the Open Space Strategy, Green Grid Strategy and other relevant strategies.
- 8.11** The Open Space Strategy sets out where strategic open space (i.e. one hectare or above) will be provided across the borough. This includes the requirements relating to the provision of playing pitches and a detailed action plan on how our open space priorities will be addressed. The Green Grid Strategy identifies opportunities on how to better connect existing open spaces and create smaller scale open spaces in areas of need.
- 8.12** For the purposes of the Local Plan, open space means all land that offers opportunity for play, recreation and sport or is of amenity value, whether in public or private ownership, and where public access is unrestricted, partially-restricted or restricted. This includes all open areas consisting of: major parks (e.g. Victoria Park and Mile End Park), local parks, gardens, local parks, squares, playgrounds, ecological spaces, housing amenity land, playing fields (including playing pitches), allotments and burial grounds, whether or not they are accessible to the public. This definition does not include water bodies.
- 8.13** Figure 13 illustrates the distribution of publicly accessible open spaces across the borough. Detailed boundaries of the borough’s publically accessible open spaces are shown on the Policies Map. Some of the borough’s open spaces and water spaces are designated as Metropolitan Open Land (including East India Dock Basin and Brunswick Wharf, Island



Gardens, Lee Valley Regional Park, Meath Gardens, Mile End Park, Mudchute Park, Millwall Park, Tower Hamlets Cemetery and Victoria Park) which form part of London's strategically defined open space network.

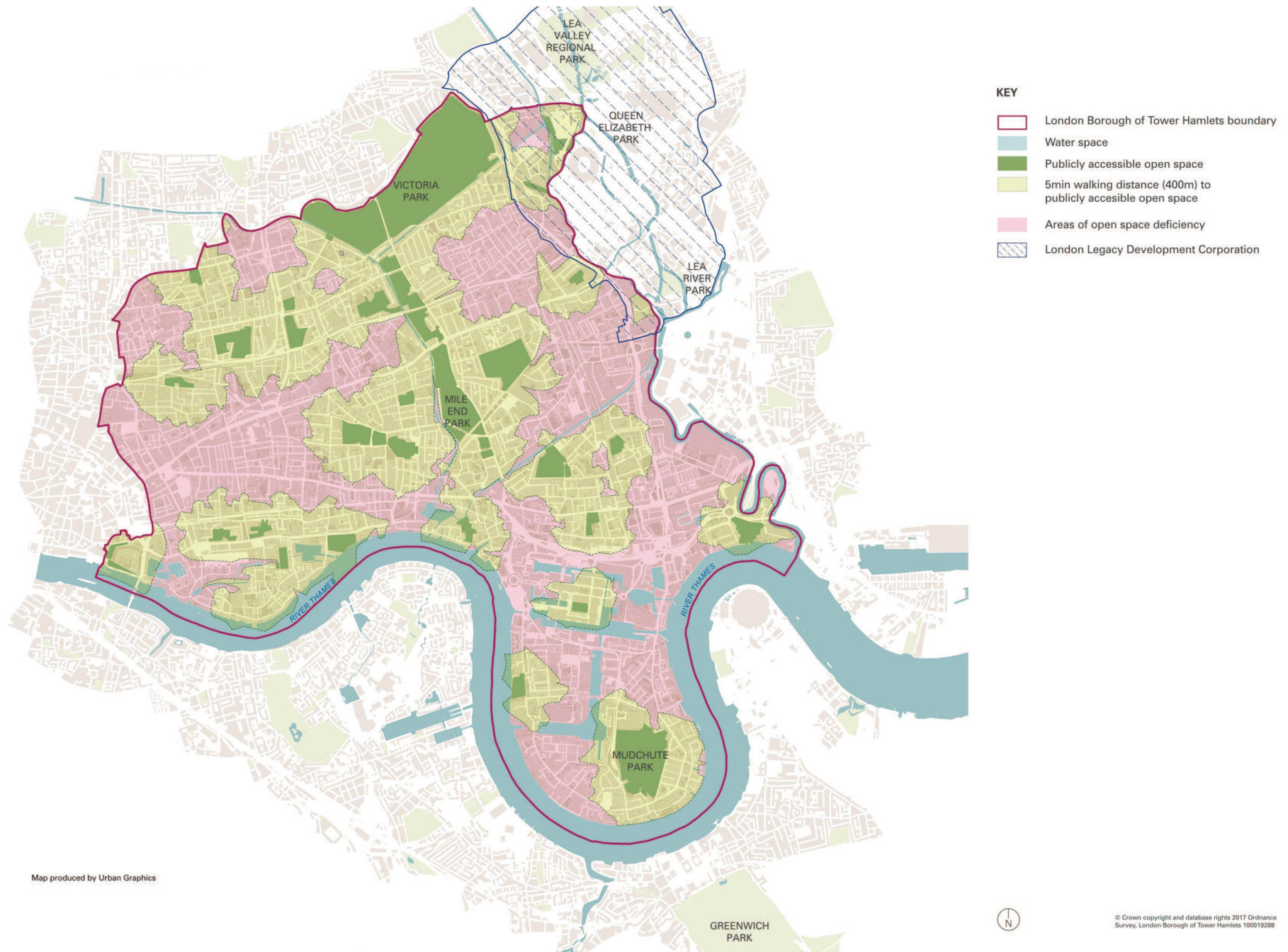
- 8.14** Part a seeks to protect all open spaces regardless of their size, type, ownership and where access is unrestricted, partially restricted or restricted.
- 8.15** Part b promotes the enhancement of the borough's existing open space to improve their quality and multi-functionality to serve a variety of users. This will be delivered through the provision of new outdoor sport facilities, such as playing pitches (e.g. ancillary facilities and changing rooms), outdoor gyms and multi-use games areas within existing parks (e.g. Victoria Park, Mudchute Park and Mile End Park). Proposals should also aim to incorporate the principles of Sport England's Active Design Guide.
- 8.16** Part c promotes the delivery of a well-connected and high quality network of publicly accessible open spaces through new and improved green grid connections. This can be achieved through new planting in the public realm (including streets, trees and vegetation) and maximising opportunities to create access to nature, natural play and educational elements along the green grid as well as improved signage and posting to enhance way-finding. The Green Grid Strategy has identified a series of strategic green grid projects (as shown on figure 13) to improve cross-borough connections and help address deficiencies across the borough as well as other parts of London.
- 8.17** Parts d and e promote the provision of new publicly accessible open spaces to serve the borough's growing population, particularly where they are of a wider strategic importance (e.g. Lea River Park) and in areas of significant open space deficiency (see figure 14<sup>(50)</sup>).

**8.18** The provision of new or improved publicly accessible open space and green grid linkages will be promoted throughout the borough in accordance with the principles set out in the Open Space Strategy, Green Grid Strategy and Mayor of London's All London Green Grid Supplementary Planning Guidance, notably at the following locations.

- Queen Elizabeth Olympic Park (i.e. improving links to open spaces and the Lea Navigation and Hertford Union canals).
- Lea Valley (including a series of new open spaces as part of the Lea River Park and a new continuous north-south route through Lea Valley connecting the Lea Valley Regional Park to the River Thames as well as new pedestrian footbridges).
- Mile End Park and Victoria Park (including green grid extensions to the existing canal walkways and nearby schools).
- Whitechapel (including the delivery of a new pedestrian route - known as the Green Spine - from the town centre to a new civic square at the site of St. Andrew's Hospital).

50 Publicly accessible open space deficiency is mapped using 400 metre catchment areas from parks of 1 hectare or above.

Figure 14 : Areas of open space deficiency





- 8.19** Larger open space (i.e. 1 hectare and above) provision will be secured on allocated sites (as identified in section 5 overleaf) through new development.
- 8.20** Delivery of smaller publically accessible open spaces such as pocket parks and linear verges will be promoted through new development
- 8.21** Innovative approaches to delivering new open space (e.g. roof-top gardens/greenhouses, community gardens and green/brown roofs) in these areas as well as locating parks in areas of the borough where accessibility to public open space is poor will be promoted.

#### Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG3: Health impact assessments
- Policy D.SG5: Developer contributions
- Policy S.DH1: Delivering high quality design
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality
- Policy S.CF1: Supporting community facilities
- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES3: Urban greening and biodiversity
- Policy S.TR1: Sustainable travel

#### Evidence links

- Tower Hamlets Open Space Strategy (2017)
- Tower Hamlets Water Space Study (2017)
- Tower Hamlets Green Grid Strategy (2017)
- Tower Hamlets Infrastructure Delivery Plan
- Tower Hamlets Local Biodiversity Action Plan (2014)
- All London Green Grid Supplementary Planning Guidance (GLA, 2012)
- Active Design Guidance (Sport England, 2015)

#### Policy S.OWS2: Enhancing the network of water spaces

1. Proposals will be required to support the creation of a network of high quality, usable and accessible water spaces network through:
  - a. protecting the integrity of the borough's water spaces;
  - b. maximising opportunities for enhancing the aesthetic, ecological and biodiversity values of the borough's water spaces (including the immediate and surrounding areas) and the water quality, in line with the Tower Hamlets Local Biodiversity Action Plan;
  - c. improving accessibility and way-finding to and along water spaces to maximise opportunities for public use and enjoyment;
  - d. promote water spaces for cultural, recreational and leisure activities as well as movement, including passenger and freight transport (e.g. along the River Thames);
  - e. working in partnership with the Port of London Authority and the Canal and River Trust to ensure that residential and commercial moorings are in appropriate locations that do not negatively impact on navigation, water quality, the openness and character of the water space and the amenity of surrounding residents; and
  - f. supporting the aims of the European Union Water Framework Directive, Thames River Basin Management Plan, Thames Estuary 2100 Plan, Thames Vision, and any relevant Marine Plans (e.g. South East Marine Plan).

#### Explanation

- 8.22** Water spaces make a positive contribution to the economy, society and the environment and should be safeguarded for water-related purposes with priority given to water management, improving water quality, managing land drainage, and avoiding, reducing and managing flood risk.

- 8.23** This policy seeks to protect and enhance the borough’s valuable network of water spaces and also ensure that they are easily accessible and provide a wide range of water-related opportunities for local communities and visitors.
- 8.24** For the purposes of the Local Plan, water space means an area of water (permanently or intermittently) and the adjacent land, and includes rivers, canals, docks, basins, ponds, marshland and other water bodies.
- 8.25** Part a seeks to ensure that development does not result in further loss or over sailing of the borough’s valuable water spaces unless it is a water-related or water-dependant use at appropriate locations. Water-dependent uses are defined as an activity which can only be conducted on, in, over or adjacent to the water because its function requires direct access to, along and across the water or involves, as an integral part of the activity, the use of the water. Appropriate infrastructure to support water-dependant uses includes:
- walkways and slipways for pedestrians, boaters and cyclists;
  - bridges and tunnels (e.g. across the rivers Lea and Thames);
  - water-based sport and leisure (e.g. sailing and kayaking);
  - security and safety (e.g. lifebuoys and other life-saving equipment);
  - water-based passengers, tourism, transport support and freight infrastructure (e.g. piers and clippers);
  - marine support facilities; and
  - moorings (including permanent and visitor moorings) and their support infrastructure.
- 8.26** In addition, other water-related uses may also be considered at suitable locations where there is clear evidence that they are specifically designed to enhance the public access, use or enjoyment of the water space and will have a positive contribution to the character of the water space without causing any adverse negative impacts on biodiversity (e.g. activate the water space to enhance it as a waterside destination). An important consideration in decision making will be the cumulative impact of existing and proposed new water related uses in order to ensure that that there is no adverse impact on the character and openness of the borough’s water space and the amenity of surrounding residents.
- 8.27** Despite their urban setting and heavily modified nature, the borough’s network of rivers, canals and docks are important for biodiversity, supporting a wide range of species of wild plants and animals (including rare and protected species) and allowing people to come into contact with nature. In accordance with part (b), development will be expected to preserve and enhance biodiversity and increase the resilience of wetland ecosystems. This can be achieved through a range of measures, such as the restoration and creation of priority habitats and planting native species to create more natural landscapes along the waterways, and the prevention of overspill of artificial lighting onto waterways or onto adjacent areas of soft landscaping.
- 8.28** Some of the borough’s water spaces are difficult to find and access from nearby transport hubs (e.g. River Lea, Shadwell Basin and West India Middle and South Docks) or have restricted and disjoint access (e.g. River Thames). Part (c) of the policy seeks to ensure that access to all water spaces is improved through appropriate signage for better way finding. Many of the borough’s water spaces (including Blackwall Basin, Hermitage Basin, Limehouse Basin, East India Dock Basin, Limehouse Cut Canal, Millwall inner and outer docks, Poplar Dock, St. Katherine’s Dock, Wapping Canal, West India Docks and the rivers Lea and Thames) are located within or adjacent to areas of open space deficiency in access to parks. These water spaces and the adjacent land therefore provide important open space functions and make a valuable contribution to the health and well-being of communities.
- 8.29** In delivering part (d) above, additional opportunities will be explored to maximise the use of the borough’s water spaces for transport and freight at suitable locations (e.g. Trinity Buoy Wharf and along the River Thames), including the introduction of additional Thames Clipper stops. Policies S.TR1 and D.TR4 provide further guidance on sustainable transport and freight.
- 8.30** Creating and enhancing the borough’s high quality, usable and accessible network of water spaces will be delivered through a coordinated approach with a wide range of stakeholders, including the Canal and River Trust, Port of London Authority, Inland Waterways Association, neighbouring boroughs and other relevant organisations (see parts e and f).

**8.31** This policy also recognises the importance of several strategic documents which provide the framework for the sustainable development of the borough's water spaces and, more specifically, the River Thames and its tributaries (see part f).

- The European Water Framework Directive provides a framework for protecting and improving the ecological quality of all water bodies.
- Following on from the European Water Framework Directive, the Thames River Basin Management Plan sets out actions to protect and enhance the river's natural environment.
- The Thames Strategy East sets out a long term framework to guide the sustainable management of the Thames Policy Area (as shown on the Policies Map) and promotes development principles, such as greater connectivity through improved foot and cycle access to and along the river Thames and the provision of water support infrastructure (e.g. bridges, piers and flood defences etc) which respects and contribute to the river's character.
- The Thames Estuary 2100 Plan sets out a comprehensive action plan to manage tidal flood risk across the River Thames.
- The Thames Vision sets out the goals and priority actions to help manage and promote the River Thames, which include: more trade and more jobs associated with the river; improved use of the river for the transportation of passengers and freight; and an improved environment and river heritage.
- Tower Hamlets falls within the remit of the Marine Plan for the South East inshore area. Once adopted, the Marine Plan for the South East will influence the sustainable marine development and activities which include a section of coastline or tidal river. The detailed boundaries of the Marine Plan for the South East inshore area (within the borough) are shown on the Policies Map. Until the Marine Plan is adopted, any development and activities within the rivers Thames and Lea should have regard to the Marine Policy Statement, which sets out the policies for managing development and activities for coastal and tidal waters.

#### Policy links

- Policy D.SG5: Developer contributions
- Policy S.DH1: Delivering high quality design
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy D.DH8: Amenity
- Policy S.H1: Meeting housing needs
- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES3: Urban greening and biodiversity
- Policy D.ES4: Flood risk
- Policy D.ES5: Sustainable drainage
- Policy D.ES6: Sustainable water management
- Policy S.TR1: Sustainable travel
- Policy D.TR4: Sustainable delivery and servicing

#### Evidence links

- Tower Hamlets Infrastructure Delivery Plan
- Tower Hamlets Open Space Strategy (2017)
- Tower Hamlets Green Grid Strategy (2017)
- Tower hamlets Water Space Study (2017)
- Tower Hamlets Local Biodiversity Action Plan (2014)
- European Union Water Framework Directive (Directive 2000/60/EC)
- Thames River Basin Management Plan (Environment Agency, 2015)
- Thames Estuary 2100 Plan (Environment Agency, 2014)
- Thames Vision Project (Port of London Authority, 2016)
- Thames Strategy East (Thames Estuary Partnership, 2008)
- UK Marine Policy Statement (2011)

## Policy D.OWS3: Open space and green grid networks

1. Development on areas of open space and the loss of playing fields arising from development will only be supported in exceptional circumstances where:
  - a. it provides essential facilities that enhance the function, use and enjoyment of the open space (e.g. ancillary sport facilities to the playing field use); or
  - b. it is a sports facility, the sporting and recreational benefits of which would outweigh the harm resulting from the loss of playing field;
  - c. as part of a wider development proposal, both an increase of open space and a higher quality of open space can be achieved; and
  - d. in any of the circumstances described in parts 2a and 2b, it is demonstrated that it will not result in any adverse impacts on the existing ecological, heritage or recreational value of the open space and the flood risk levels within and beyond the boundaries of the site.
  
2. Strategic development should contribute to the delivery of new publicly accessible open space on-site which should:
  - a. be visible and accessible from the public realm surrounding the site;
  - b. be of a high quality and inclusive design and provide facilities to promote active recreation and healthy lifestyles;
  - c. be well-connected and way-marked to other open spaces, in accordance with the Green Grid Strategy and Open Space Strategy;
  - d. contribute towards meeting the demand that they generate through the provision of on-site sport facilities and/or providing additional capacity off-site;
  - e. incorporate soft landscaping and sustainable urban drainage systems; and
  - f. enhance biodiversity, contributing to the objectives identified in the Local Biodiversity Action Plan.

3. Development should not solely rely upon existing publicly accessible open space to contribute towards on-site communal amenity space and child play space.
4. Development should not adversely impact on the public enjoyment, openness, ecological and heritage value of the borough's publicly accessible open spaces.
5. Development adjacent or in close proximity to the green grid network (i.e. 200 metres) is required to demonstrate that it will not have adverse impacts on the access, design, usability, biodiversity and recreational value of the green grid network. It should also contribute to the expansion and the enhancement of green grid links to connect communities to publicly accessible open spaces and water spaces as well as other main destination points, such as town centres, schools, health facilities and transport hubs.
6. Development of community allotments, gardens and pocket parks will be encouraged, particularly where they bring into use vacant developable land on a temporary basis.

### Explanation

- 8.32** This policy aims to ensure that development does not negatively impact on the existing network of publicly accessible open space and contributes to its expansion and enhancement. It also seeks to maximise the opportunities for delivery of new open space and for enhancing accessibility and connectivity to the wider network, which is considered crucial to addressing the borough's open space deficiency (as shown on figure 14).
- 8.33** Development on areas of open space will be resisted unless in the circumstances specified in part 2 (a and b). The types of development that are considered to be acceptable in principle within areas of open space include changing rooms, play equipment and seating. They should be of a scale and function proportionate to the open space in which they are to be located and should be purely ancillary to it.



- 8.34** In relation to part 1 (b), there may be instances (for example in housing estate regeneration schemes) where building on fragmented areas of poor quality open space enables the provision of a larger consolidated area of open space which is more usable for the local community. In these circumstances, the starting point will be no net loss of open space but if the development is resulting in an increase in population then additional open space will be required in accordance with the principles set out in policy S.OWS1.
- 8.35** Part 2 seeks to promote delivery of new publicly accessible open space and the provision of new publicly accessible open space on strategic schemes (i.e. more than 100 homes or over 10,000 square metres floorspace) where development is considered to place significant additional demand on existing publicly accessible open space, particularly in identified areas of open space deficiency (see figure 14).
- 8.36** Where publicly accessible open space is provided on site, it should aim to meet the local standard of 1.2 hectares per 1000 residents (as identified in the Open Space Strategy) and be designed to support the key open space functions, as specified in part 2 (a - e) in line with the All London Green Grid Supplementary Planning Guidance. Future management and maintenance of new publicly accessible open space will be secured through planning conditions or legal agreements to ensure the highest possible level of public access, function and use.
- 8.37** Where the new publicly accessible open space is delivered to a satisfactory standard that meets all criteria specified in part 2, we may consider this on-site provision as payment in kind. The provision of amenity space or landscaping required as part of good design to mitigate the impact of development will not be considered as appropriate publicly accessible open space provision. The level and nature of any sports provision should take account of the recommendations set out in Sport England's guidance and our Open Space Strategy and its associated action plan.
- 8.38** Where on-site provision of adequate publicly accessible open space is not possible, a contribution will be sought from the developer towards the delivery of the opportunities and the strategic projects identified in the Open Space Strategy and Green Grid Strategy in accordance with the Planning Obligations Supplementary Planning Document.
- 8.39** Part 3 seeks to ensure that residential developments will not place undue pressure on publicly accessible open space and will not be allowed to solely rely upon nearby public open space to contribute to adequate outdoor communal amenity space, including child play space in line with the principles set out in policy D.H3.
- 8.40** In accordance with part 4, development will be expected to demonstrate that it will enhance and not negatively affect the borough's publicly accessible open space, including the Lee Valley Regional Park (consisting of East India Dock Basin and linear towpaths along the River Lea Navigation, Hertford Union Canal and Limehouse Cut) and Lea River Park (including the Leaway). The Lea Valley Regional Park forms an important part of the borough's green grid and water spaces network and has the potential to contribute to creating healthy and liveable communities, particularly where links into this network can be enhanced and complemented with new open space delivered as part of development<sup>(51)</sup>. We will work together with the Lea Valley Regional Park Authority and the Environment Agency to support proposals set out in the Tower Hamlets Local Biodiversity Action Plan, the Park Plan and Park Development Framework, where they relate to the borough. We will also work with neighbouring authorities and relevant stakeholders to support the delivery of the Lea River Park (including the Leaway), which connects Queen Elizabeth Olympic Park and the Lea Valley Regional Park to the Royal Docks and the River Thames through a new continuous walking and cycling route along the River Lea. Further development principles and guidance are included in the Lea River Park Primer and Lea River Park Design Manual.

51 The Lea Valley Regional Park Authority has a statutory duty to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the park.

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- 8.41** For the purposes of implementing this policy, development would be considered to be in close proximity to the green grid where it is located within 200 metres (equivalent to around three minutes walking time) of the green grid network (see part 5 above).
- 8.42** Development adjoining or within close proximity to the green grid (as shown on the Policies Map) - including the Lee Valley Regional Park, Lea River Park, Thames Path National Trail and canal towpaths - will be required to contribute to linking and improving the connectivity of green grid links in accordance with the Green Grid Strategy and the Mayor of London's All London Green Grid Supplementary Planning Guidance. This should be supported with adequate signage and facilities for visitors and tourists.
- 8.43** Part 6 encourages the creation of community allotments, gardens and pocket parks which promote healthier lifestyles and greater social interactions.

- Tower Hamlets Green Grid Strategy (2017)
- Tower Hamlets Local Biodiversity Action Plan (2014)
- All London Green Grid Supplementary Planning Guidance (GLA, 2012)
- Lea River Park Design Manual (2016)
- Lea River Park Primer (2016)
- Park Plan (Lea Valley Regional Park Authority, 2000)
- Park Development Framework (Lea Valley Regional Park Authority)

## Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG3: Health impact assessments
- Policy D.SG5: Developer contributions
- Policy S.DH1: Delivering high quality design
- Policy D.DH2: Attractive and safe streets, spaces and public realm
- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality
- Policy S.CF1: Supporting community facilities
- Policy S.ES 1: Protecting and enhancing our environment
- Policy D.ES3: Urban greening and biodiversity
- Policy S.TR1: Sustainable travel

## Evidence links

- Tower Hamlets Infrastructure Delivery Plan
- Tower Hamlets Open Space Strategy (2017)

**Policy D.OWS4: Water spaces**

1. Development within or adjacent to the borough's water spaces is required to demonstrate that:
  - a. it does not result in loss or covering of the water space, unless it is a water-related use at appropriate locations;
  - b. there are no adverse impacts on the existing water spaces network, including navigation, biodiversity, water quality, visual amenity, openness and the character and heritage value of the water space, taking into consideration the adjacent land and the amenity of existing surrounding developments;
  - c. it enhances the ecological, biodiversity and aesthetic quality of the water space, taking into account the design and landscaping of the adjacent land area, in line with the Tower Hamlets Local Biodiversity Action Plan and the European Union Water Framework Directive;
  - d. it does not have an adverse impact on other existing active water uses;
  - e. it will provide increased opportunities for continuous public access, use of the water space for water-related uses and sport and recreational activities;
  - f. it responds positively and sensitively to the setting of water space, while respecting and animating water space to improve usability and safety; and
  - g. it provides suitable setbacks from water space edges to mitigate flood risk and to allow riverside walkways, canal towpaths and cycle paths, where appropriate. Where necessary, development should contribute to the restoration of the river walls and embankments.
2. Development within the Thames Policy Area (as shown on the Policies Map) is required to consider the guidance provided within the most up-to-date Thames River Basin Management Plan and the relevant Southeast Marine Plan, where applicable.
3. Development adjacent to the borough's waterspaces is required to enhance the area's links with the water space and contribute to the

delivery of continuous walkways, canal towpaths and cycle paths( e.g. completion of the Thames Path).

4. Development of residential moorings will be considered acceptable at suitable locations, and where they do not cause any adverse impact on navigation, biodiversity, the micro climate, the amenity of surrounding residents and the public enjoyment of the water space.

**Explanation**

- 8.44** This policy seeks to provide details of how the borough's water spaces will be protected and how the various functions they offer are maintained and enhanced.
- 8.45** Part 1 requires development to demonstrate that it will not result in loss or covering of water space and that it will not compromise the suitability of the water space for water-related uses (as defined in policy S.OWS2). Further water loss and over-sailing from development will be resisted throughout the borough, particularly at locations that have experienced significant water space loss, such as West India South Dock, West India Middle Dock, West India North Dock, Blackwall Basin and Poplar Dock in Canary Wharf.
- 8.46** In line with London Plan policies and guidance, provision of appropriate water space support infrastructure (including but not limited to: transport and essential access infrastructure into and alongside water spaces, boatyards, moorings, jetties and safety equipment) will be supported at suitable locations. Further details on infrastructure for water-related and water-dependent uses are included in policy S.OWS2. The Infrastructure Delivery Plan provides information on the current need for some water support infrastructure (e.g. bridges).
- 8.47** Public access to and along the borough's water spaces will be improved, particularly where access is currently restricted, including the docks around Canary Wharf (including West India Middle Dock and Blackwall Basin), the River Lea and the River Thames (e.g. the Thames path).

**8.48** Safety and public use of the borough’s water spaces will be improved through development design which provides good pedestrian access and active frontages to improve surveillance. Increased appeal through active frontages will be particularly important for the docks in Canary Wharf as well as areas around Trinity Buoy Wharf, Limehouse Basin and along the River Lea which can have significant potential to attract visitors.

**8.49** The edges of water space are an extremely important part of the functioning of water space as ecosystems, open space and transport networks. Development proposals must ensure that such areas are protected and provide setbacks from the edges of the water space as well as contribute to restoration following the Environment Agency’s Estuary Edges guidance. How this restoration should be undertaken will need to be considered against the functions of the water space and an appropriate balance will be sought between uses on the water space and access to and interaction with the water space and ecological enhancements in line with the Tower Hamlets Local Biodiversity Action Plan. Setbacks from waterways are also required for flood management purposes and further details outlining their use are provided in policy D.ES4. Where setbacks are required they provide an opportunity to increase enjoyment of the waterways and should be designed to look and feel publicly accessible (e.g. through the use of signposting).

**8.50** The River Thames provides important additional opportunities to that of other water spaces within the borough, acting as a transport link of strategic and historical importance. Developments in the Thames Policy Area (as identified on the Policies Map) should ensure that their use and design establishes a positive relationship with the river in accordance with the most up-to-date guidance within the Thames Policy Area (e.g. Thames Strategy East and Thames River Basin Management Plan) and supplementary planning documents (see part 2).

**8.51** Part 3 promotes the improved public access to and along the borough’s water spaces, particularly where it is currently restricted, partially restricted or fragmented (e.g. along the River Thames, the River Lea and the docks around Canary Wharf, including West India Middle Dock and Blackwall Basin). The Thames Path forms part of the National Trail. We are committed to maintaining the existing National Trail and expanding the Thames Path along the eastern part of the Isle of Dogs to connect it to the Leaway as a publicly accessible continuous route.

Developments adjacent to the River Thames should contribute towards the delivery and maintenance of this route. Where the Thames Path cannot be delivered adjacent to the River Thames, due to heritage reasons, we will require the development to contribute towards the signposting, design and maintenance of an alternative route.

**8.52** We will work together with the Port of London Authority and Canal and River Trust to determine the suitability of moorings (including residential and commercial moorings) on the borough’s water spaces. Key considerations in assessing the impact of mooring proposals will include: navigation, water quality, biodiversity, openness and character of the water space and surrounding area, surrounding residential amenity, waste management and air quality as well as the adequate supply of electricity provision. The Tower Hamlets Water Space Study identifies some of the locations which may be considered suitable for further development of residential moorings, including at the Regents Canal, Blackwall Basin, Poplar Dock, Milwall Inner and Outer Docks and the West India South Dock.

### Policy links

- Policy D.SG5: Developer contributions
- Policy S.DH1: Delivering high quality design
- Policy D.DH8: Amenity
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy D.DH7: Amenity
- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES3: Urban greening and biodiversity
- Policy D.ES4: Flood risk
- Policy D.ES5: Sustainable drainage
- Policy D.ES6: Sustainable water management
- Policy S.TR1: Sustainable travel
- Policy D.TR4: Sustainable delivery and servicing



**Evidence links**

- Tower Hamlets Infrastructure Delivery Plan
- Tower Hamlets Open Space Strategy (2017)
- Tower Hamlets Water Space Study (2017)
- Tower Hamlets Green Grid Strategy (2017)
- Tower Hamlets Local Biodiversity Action Plan (2014)
- European Union Water Framework Directive (Directive 2000/60/EC)
- Thames River Basin Management Plan (Environment Agency, 2015)
- Thames Estuary 2100 Plan (Environment Agency, 2012)
- Thames Vision Project (Port of London Authority, 2016)
- Thames Strategy East (Thames Estuary Partnership, 2008)
- UK Marine Policy Statement (2011)
- Estuary Edges: Ecological Design Guidance (Environment Agency, 2011)

## Chapter 9: Protecting and managing our environment

### Introduction

- 9.1** There is a pressing need to plan and manage growth and resources in a sustainable way that conserves, maintains and enhances the borough's environment. Sustainable growth requires careful stewardship of our resources (land, water and energy) to reduce carbon emissions, improve air quality, conserve water resources, protect biodiversity and mitigate flood risk.
- 9.2** 9.2 Despite its urban character, Tower Hamlets has areas of notable biodiversity value, including 3 Local Nature Reserves and 35 Sites of Importance for Nature Conservation. However, parts of the borough, including the City Fringe, Poplar and the western edge of the Isle of Dogs are considered to be nature deficient.
- 9.3** Parts of the borough are at potential risk of flooding. Whilst the Thames Barrier and other flood defences currently provide effective protection from flooding, their continued maintenance, along with further investment in flood defences, is required. Climate change will also have an impact on flood risk and must be considered in order to mitigate the risk of flooding for the expected lifetime of a development. The borough also has a number of critical drainage areas which are at higher risk of surface water flooding. Despite this, London has lower rainfall than the national average, whilst having a very high population density. This combination has resulted in London being declared an area of serious water stress and this trend is likely to be exacerbated by climate change<sup>(52)</sup>.
- 9.4** Carbon emissions in the borough have been falling steadily over recent years, but Tower Hamlets still produces the third highest level of total carbon dioxide emissions of all the boroughs in London<sup>(53)</sup>.

**9.5** The whole of the borough falls within an Air Quality Management Area parts of which exceed the World Health Organisation guideline limits and European Union safe legal limits on harmful pollutants.

**9.6** This section contains the following policies.

- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES2: Air quality
- Policy D.ES3: Urban greening and biodiversity
- Policy D.ES4: Flood risk
- Policy D.ES5: Sustainable drainage
- Policy D.ES6: Sustainable water management
- Policy D.ES7: A zero carbon borough
- Policy D.ES8: Contaminated land and storage of hazardous substances
- Policy D.ES9: Noise and vibration
- Policy D.ES10: Overheating

52 Securing London's Water Future: The Mayor's Water Strategy (GLA, 2011)

53 UK Local Authority and Regional Carbon Dioxide Emissions: 2005 – 2014 (National Statistics, 2016)

**Policy S.ES1: Protecting and enhancing our environment**

1. Proposals will be supported which minimise the use of natural resources and work proactively to protect and enhance the quality of the natural environment, through:
  - a. reducing the areas of sub-standard air quality in the borough and contributing towards delivering the objectives of the latest Tower Hamlets Air Quality Action Plan;
  - b. protecting and enhancing biodiversity, with the aim of meeting the objectives of the latest Tower Hamlets Local Biodiversity Action Plan and Thames River Basin Management Plan and improving opportunities to experience nature, in particular in deficient areas;
  - c. using the sequential and exceptions tests to direct development away from high flood risk areas and reduce flood risk in the borough;
  - d. reducing clean and waste water use;
  - e. following the energy hierarchy: be lean, be clean and be green;
  - f. maximising climate change adaptation measures; and
  - g. improving water and land quality and mitigating the adverse effects of contaminated land on human health.

**Explanation**

- 9.7** This policy seeks to protect, maintain and enhance the key aspects of the borough's environment in line with local, sub-regional, regional, national and international plans and programmes.
- 9.8** Development plays a key role in improving air quality and reducing exposure to poor air quality. Areas of sub-standard air quality are areas where nitrogen dioxide levels exceed 40 micrograms per cubic meter of air ( $\mu\text{g}/\text{m}^3$ ): the European Union legal limit. This includes areas in which the particulate (PM2.5) levels exceed 10  $\mu\text{g}/\text{m}^3$  annual mean limits (World

Health Organisation guideline limits). The Tower Hamlets Air Quality Action Plan identifies the ways in which development can improve air quality in the borough.

- 9.9** The Tower Hamlets Local Biodiversity Action Plan identifies priority species and habitats to ensure the ongoing improvement of biodiversity across the borough. The Thames River Basin Management Plan sets out objectives to protect and enhance the water bodies in the basin/catchment area. Part b of the policy ensures that development contributes to meeting the objectives of these plans. In addition, to address nature deficiency, we aim to maximise opportunities for biodiversity in and around developments in order to deliver a net gain in biodiversity and a range of wider environmental benefits.

- 9.10** In recognition of the borough's areas of flood risk, more vulnerable development should be located away from areas of flood risk, as shown on the Policies Map. As part of our commitment to reducing the risk of flooding, we will work closely with national and regional bodies and neighbouring authorities to:

- maintain and improve the existing flood defences;
- ensure effective emergency-planning practices are in place;
- keep up-to-date information about flood risk in the borough; and
- support the development of the Thames Tideway Tunnel and associated storm relief connections.

- 9.11** Development must also address London's water stress by reducing clean and waste water use.

- 9.12** Development should aim to reduce carbon emissions and adhere to the principles of the energy hierarchy set out below.

- Be lean: use less energy.
- Be clean: supply energy efficiently.
- Be green: use renewable energy.

- 9.13** New development (including buildings and the spaces between them) also needs to be planned, designed and constructed to respond to future anticipated changes in climate such as warmer, wetter winters and hotter, drier summers, and the risks associated with such changes: the

urban heat island effect, heat waves, flooding and droughts. Further guidance can be found in the Sustainable Design and Construction Supplementary Planning Guidance (GLA, 2014).

**9.14** Development must also consider and mitigate existing contamination as well as prevent any further contamination of water or land.

### Policy links

- Policy S.OWS2: Enhancing the network of water spaces
- Policy D.OWS4: Water spaces
- Policy S.MW1: Managing our waste

### Evidence links

- Tower Hamlets Air Quality Action Plan
- Tower Hamlets Local Biodiversity Action Plan (2015)
- Tower Hamlets Strategic Flood Risk Assessment (2017)
- Thames River Basin Management Plan (Environment Agency, 2015)
- Sustainable Design and Construction Supplementary Planning Guidance (GLA, 2014)

### Policy D.ES2: Air quality

1. Development is required to meet or exceed the 'air quality neutral' standard, including promoting the use of low or zero emission transport and reducing the reliance on private motor vehicles.
2. An air quality impact assessment, based on current best practice, is required as part of the planning application for:
  - a. major developments;
  - b. developments which will require substantial earthworks or demolition;
  - c. developments which include education and health facilities or open space (including child play space); and
  - d. new build developments in areas of sub-standard air quality (as shown on the Policies Map).
3. Where an air quality assessment indicates that a development will cause harm to air quality or where end users could be exposed to poor air quality, development will be resisted unless mitigation measures are adopted to reduce the impact to acceptable levels.
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.

### Explanation

**9.15** Improving the borough's air quality is one of our key priorities. Levels of nitrogen dioxide and particulates (PM10 and PM2.5) are of particular concern, due to their impacts on human health<sup>(54)</sup>. In parts of the borough, including the City Fringe and along all major roads, the levels of nitrogen dioxide and particulates (PM2.5 and PM 10) exceed World

Health Organisation guideline limits and, in the case of nitrogen dioxide, European Union safe legal limits<sup>(55)</sup>. Poor air quality has well-evidenced significant adverse effects on health. Further guidance on the 'air quality neutral standard' is outlined in the Sustainable Design and Construction Supplementary Planning Guidance (GLA, 2014)<sup>(56)</sup>.

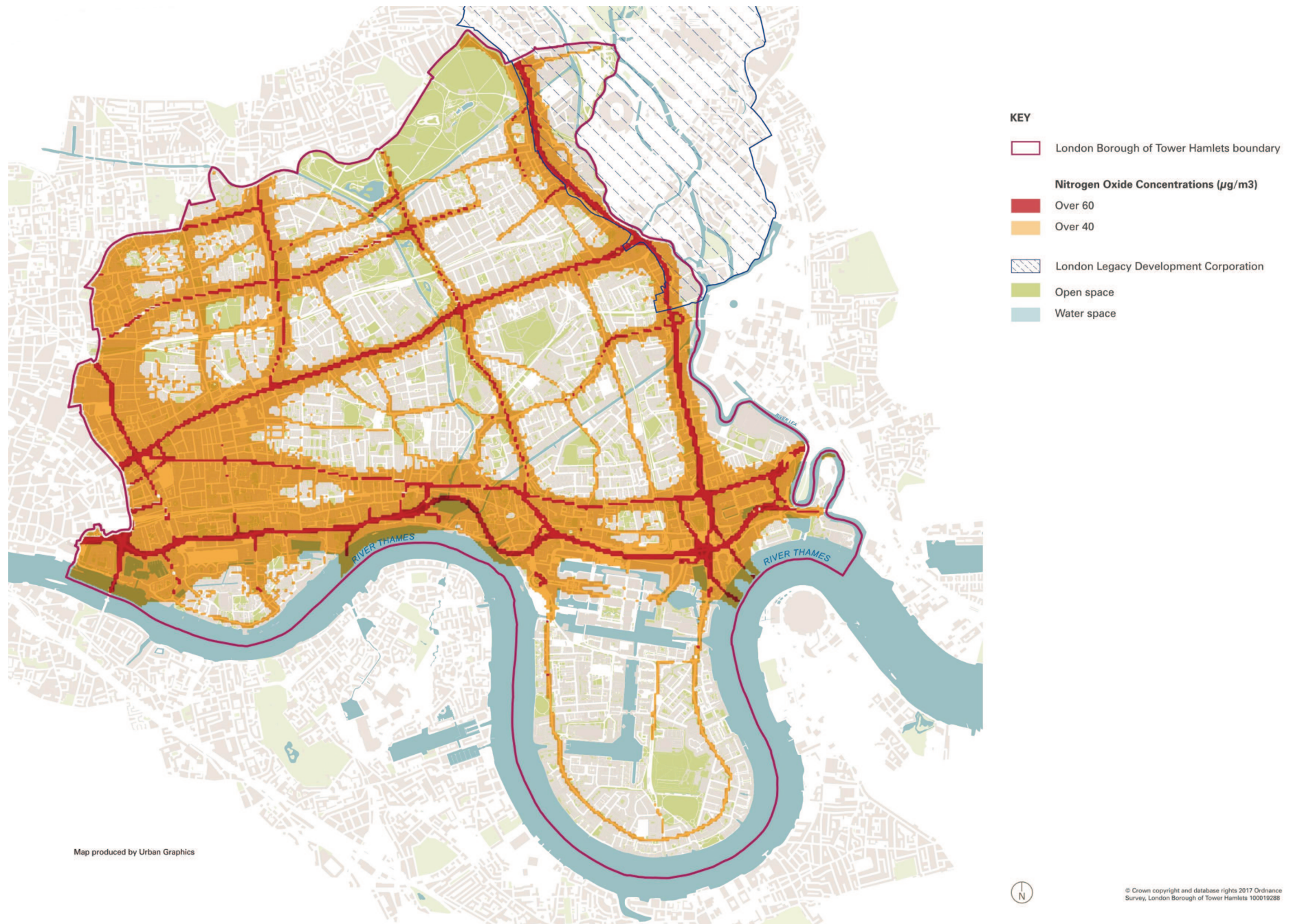
- 9.16** In those parts of the borough where air quality is below European Union safe limits for nitrogen dioxide levels, particular focus will be placed on improving air quality, protecting users from the effects of poor air quality and protecting vulnerable uses, such as schools. Education uses covered under this policy are primary and secondary schools and does not include further or higher education facilities. Areas of sub-standard air quality refer to areas where nitrogen dioxide levels exceed  $40 \mu\text{g}/\text{m}^3$  (the European Union legal limit). This includes areas in which the particulates (PM2.5) levels exceed  $10 \mu\text{g}/\text{m}^3$  annual mean levels (World Health Organisation guideline limits) as identified on the Policies Map and figure 15. Please note: air quality fluctuates and applications should be guided by the latest available monitoring data.

55 Tower Hamlets Air Quality Annual Status Summary Report (2016)

56 Please note: part 1 above does not apply to infrastructure projects, such as road schemes



Figure 15 : Areas of substandard air quality in Tower Hamlets



**9.17** The air quality assessment must consider the potential impacts of pollution from the development on occupants of the site and neighbouring areas during construction and operational phases. It should also consider the cumulative impact of surrounding developments. Cumulative impacts should be considered for developments occurring in a one kilometre radius. The air quality assessment and the construction management plan should contain details of compliance with European emissions standards. Proposals that would give rise to diffuse air pollution must consider the potential for effects on European sites of nature conservation importance, in particular Epping Forest.

**9.18** The air quality assessment must also outline the mitigation measures to mitigate any adverse effects during construction or operation. This could include:

- reducing vehicular traffic levels;
- encouraging sustainable movement patterns; methods of carrying out construction;
- actions to reduce emissions throughout the lifetime of the building;
- reducing emissions from associated plant equipment;
- improving or greening the public realm; and
- ensuring decentralised energy facilities do not contribute to poor air quality.

**9.19** Under parts 3 and 4 above, mitigation measures to reduce people's exposure to poor air quality could include the following (in order of priority).

- Maximising distance from pollutant source (the recommended distance would be over 50 metres from the pollution source).
- Considering proven ventilation systems.
- Parking considerations (in accordance with our transport policies set out in S.TR1 and D.TR3).
- The use of winter gardens, instead of balconies.
- Internal layout and minimising internal pollutant emissions.

#### Policy links

- Policy D.SG3: Health impact assessments
- Policy D.SG4: Construction of new development
- Policy S.DH2: Attractive streets, spaces and public realm
- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality
- Policy S.CF1: Supporting community facilities
- Policy D.CF3: New community facilities
- Policy S.OWS1: Creating a network of open spaces
- Policy S.TR1: Sustainable travel
- Policy D.TR3: Parking and permit-free
- Policy D.TR4: Sustainable transportation of freight

#### Evidence links

- Land-use Planning & Development Control: Planning for Air Quality (Institute of Air Quality Management, 2017)
- London Local Air Quality Management Technical Guidance (GLA, 2016)
- Guidance on the assessment of dust from demolition and construction (Institute of Air Quality Management, 2014)
- Design Manual for Roads and Bridges Volume 11 Environmental Assessment (Highways Agency, 2012)

## Policy D.ES3: Urban greening and biodiversity

1. Development is required to protect and enhance biodiversity, through:
  - a. maximising the provision of 'living building' elements;
  - b. retaining existing habitats and features of biodiversity value or, if this is not possible, replacing them within the development, as well as incorporating additional measures to enhance biodiversity, proportionate to the development proposed; and
  - c. protecting and increasing the provision of trees, through:
    - i. protecting all trees, including street trees;
    - ii. incorporating native trees, wherever possible; and
    - iii. providing replacement trees, including street trees, where the loss of or impact on trees in a development is considered acceptable.
2. Major development is required to submit an ecology assessment demonstrating biodiversity enhancement that contributes to the objectives of the latest Tower Hamlets Local Biodiversity Action Plan and the Thames River Basin Management Plan.
3. Planting and landscaping around developments must not include 'potentially invasive non-native species'. Invasive non-native species listed in schedule 9 of the Wildlife and Countryside Act must be controlled, and eradicated where possible, as part of redevelopment.
4. Development must not negatively impact on any designated European site such as Special Protection Areas, Special Areas of Conservation or Ramsar sites. Developments which might have the potential to adversely impact a Special Protection Area or Special Area of Conservation outside the borough will be required to submit Habitat Regulations Assessments.

5. Developments which affect a Site of Importance for Nature Conservation, or significantly harm the population or conservation status of a protected or priority species, are required to be managed in accordance with the following hierarchy:
  - a. Adverse impacts to the biodiversity interest should be avoided.
  - b. Where avoidance is not possible, proposals must minimise and mitigate the impact to the biodiversity interest.
  - c. As a last resort for exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, appropriate compensation will be sought.
  - d. Where appropriate compensation is not possible, planning permission will be refused.

### Explanation

**9.20** Tower Hamlets has a diverse range of sites of biodiversity value, including areas of open space, waterways and formally designated Sites of Importance for Nature Conservation (SINCs). Living building elements enhance biodiversity, both directly through planting and indirectly through providing habitats<sup>(57)</sup>. They also have flood reduction, climatic and air quality benefits, helping to remove carbon dioxide from the air and reduce temperatures.

**9.21** In implementing part 1 (a) 'living building' elements need to contribute to local biodiversity through providing priority habitats, and/or features for priority species, as identified in the latest Tower Hamlets Local Biodiversity Action Plan. The types of 'living building' techniques we consider appropriate include living roofs, walls, terraces and other building greening techniques. 'Living building' elements should also be considered alongside the sustainable urban drainage requirements outlined in policy D.ES5, and green grid requirements outlined in policies S.OWS1 and S.OWS2. Providing living building elements is considered particularly beneficial in areas of sub-standard air quality or in areas at



particular risk of experiencing the urban heat island effect. The risk of experiencing the 'heat-island' effect should be considered over the lifetime of the development. Details of ongoing maintenance of the 'living building' elements will also be required.

**9.22** According to the London Climate Change Partnership, areas at particular risk of experiencing the urban heat island effect include the following.

- Areas of green space deficiency (see figure 14). This includes developments within identified areas of deficiency of access to nature.
- Areas of high density development with clusters of tall buildings. This includes developments within identified Tall Building Zones (see policy D.DH6).
- Areas experiencing high levels of pollution. This includes developments within identified areas of sub-standard air quality (as shown on the Policies Map).

**9.23** In implementing part 1 (b), consideration will be given to the size, scale and nature of the development and whether an appropriate level of provision is proposed. Even minor development, such as rear extensions, have the ability to provide biodiversity measures through items such as living roofs, walls and habitat structures such as bat and bird boxes. Under parts 1 and 2, the latest Tower Hamlets Local Biodiversity Action Plan should give details of priority habitats and/or features for priority species. Features of biodiversity or ecological value include:

- linear corridors, such as watercourses, hedgerows and buffer zones;
- veteran trees;
- old hedges; and
- habitats or species identified as local<sup>(58)</sup>, London<sup>(59)</sup> or national<sup>(60)</sup> priorities, and features which might support such species.

**9.24** Where geographically relevant, the Thames River Basin Management Plan objectives should also be incorporated.

**9.25** 'Potentially invasive non-native species' include plants listed on schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and plants identified as species of concern by the London Invasive Species Initiative. In addition, planting schemes should be selected according to their suitability for local growing conditions (soil, temperature ranges, rainfall, sunlight and shade), their ability to attract wildlife (e.g. nectar rich planting) and to conserve water. Planting along river corridors should only include native species. This will need to be evidenced in the ecology statement.

**9.26** Part 4 seeks to protect the integrity of any European or nationally designated site of nature conservation importance. There are no such sites within Tower Hamlets, but development may have the potential to adversely impact sites beyond its boundary – such as the Epping Forest Special Area of Conservation and the Lea Valley Special Protection Area - through air pollution and/or increased visitor pressure. Where the application is of such a scale, location or nature as to potentially have such an effect on a European site, applicants should seek advice from Natural England as to whether a Habitat Regulations Assessment would be required. The assessment will need to demonstrate that the development will not adversely impact on the integrity of the European site. Proposals will be resisted where they will have significant adverse impact on European sites.

**9.27** Part 5 seeks to protect locally designated Site of Importance for Nature Conservation (SINCs) and important species. The presence of protected species is a material planning consideration where a development is likely to result in harm to a habitat or species. Priority species are those identified in the Tower Hamlets Local Biodiversity Action Plan, Species of Conservation Concern in London and Species of Principal Importance in England, as identified under section 41 of the Natural Environment & Rural Communities Act. If a SINC or a protected or priority species is likely to be affected, an ecology assessment will be required. The ecology assessment should include:

58 Tower Hamlets Local Biodiversity Action Plan (2015)

59 London Biodiversity Action Plan (GLA, 2007)

60 Species of Principal Importance in England identified under section 41 of the Natural Environment & Rural Communities Act (2016)

- information assessing the characteristics and situation of the site; and
- details on how the proposals will protect, replace and enhance existing biodiversity on the proposed site, including measures for wildlife habitats and features aimed at particular species.

**9.28** Applications should also detail how recommendations are being included in the development proposals. Should the ecology assessment indicate an adverse impact on the biodiversity interest of the site, this will be managed using the hierarchical approach outlined in part 4 above. Should compensation be sought, it would be at the level required to adequately offset the impact on the SINC or protected/priority species, through the provision of an alternative site or habitat.

- information assessing the characteristics and situation of the site; and
- details on how the proposals will protect, replace and enhance existing biodiversity on the proposed site, including measures for wildlife habitats and features aimed at particular species.

**9.29** Applications should also detail how recommendations are being included in the development proposals. Should the ecology assessment indicate an adverse impact on the biodiversity interest of the site, this will be managed using the hierarchical approach outlined in part 4 above. Should compensation be sought, it would be at the level required to adequately offset the impact on the SINC or protected or priority species, through the provision of an alternative site or habitat.

### Policy links

- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality
- Policy S.OSW1: Creating a network of open spaces
- Policy S.OSW2: Enhancing the network of water spaces
- Policy D.OSW3: Open space and green grid network
- Policy D.OSW4: Water spaces

### Evidence links

- Tower Hamlets Local Biodiversity Action Plan (2015)
- Tower Hamlets Strategic Flood Risk Assessment (2017)
- London Biodiversity Action Plan (GLA, 2007)

**Policy D.ES4: Flood risk**

1. Development is required to be located in areas suitable for the vulnerability level of the proposed uses with:
  - a. highly vulnerable uses not allowed within flood zone 3a;
  - b. essential infrastructure and more vulnerable uses within flood zone 3a required to pass the exception test; and
  - c. highly vulnerable uses within flood zone 2 required to pass the exception test.
2. Development is required to provide a flood risk assessment if it meets any of the following criteria.
  - a. The development site is over 1 hectare in size within flood zone 1.
  - b. The site is within flood zones 2 or 3a.
  - c. The development may be subject to other sources of flooding, as defined in the Tower Hamlets Strategic Flood Risk Assessment.
3. The flood risk assessment should include:
  - a. a sequential test if the development is in flood zone 2 or 3;
  - b. the risks of both on and off-site flooding to and from the development for all sources of flooding including fluvial, tidal, surface run-off, groundwater, ordinary watercourse, sewer and reservoir;
  - c. an assessment of tidal risk in the event of a breach in the River Thames defences;
  - d. the impact of climate change using the latest government guidance;
  - e. demonstration of safe access and egress; and
  - f. mitigation measures, taking account of the advice and recommendations set out in the Tower Hamlets Strategic Flood Risk Assessment.

4. Site design of development which meets criteria outlined in part 2 above is required to:
  - a. undertake a sequential approach to development layout to direct highest vulnerability uses to areas of the site with lowest flood risk; and
  - b. incorporate flood resilience and/or resistance measures.
5. Development is required to protect and where possible increase the capacity of existing water spaces and flood storage areas to retain water.
6. Development is required to enable effective flood risk management through:
  - a. requiring development along the River Thames, River Lea and its tributaries to be set back by the following distances unless significant constraints are evidenced:
    - i. a minimum of a 16-metre buffer strip along a tidal river; and
    - ii. a minimum of a 8-metre buffer strip along a fluvial river.
  - b. optimising opportunities to realign or set back defences and improve the riverside frontage to provide amenity space and environmental enhancement.

**Explanation**

- 9.30** Large parts of Tower Hamlets, including the Isle of Dogs and Lower Lea Valley, are in medium to high risk flood areas (zones 2 and 3a)<sup>(1)</sup>. The flood risk zones are shown on the Policies Map and figure 16. New development must not increase the risk of flooding and must provide mitigation measures to reduce their impact on flood risk, including enabling the repair and further delivery of flood defences.

# 142 PART 3: POLICIES

**9.31** For parts 1 and 4 of the policy, the vulnerability of uses is defined within the National Planning Policy Framework and are contained in the latest Strategic Flood Risk Assessment. Highly vulnerable uses include a self-contained basement without internal access to the upper floors above breach level. More vulnerable uses include a basement with access to upper floors above the breach level. All basement developments are required to conduct a basement impact assessment to demonstrate that proposals safeguard structural stability, are safe from a flood risk perspective, and will not have any adverse impacts on local hydrogeology. It should take account of the guidance provided in the Strategic Flood Risk Assessment.

**9.32** In order to address parts 2 and 3, the flood risk assessment should also:

- be proportionate with the degree of flood risk that the proposed development is exposed to and may exacerbate;
- consider the cumulative impact of existing and future development; and
- demonstrate where adjacent to flood defences that development will safeguard and maintain the existing flood defences over its lifetime.

**9.33** Developments within site allocations (see section 4) which seek to deliver their allocated use do not have to undertake a sequential test, even if the site is in flood zone 2 or 3, as required under part 3a above<sup>(61)</sup>.

**9.34** Flood resistance refers to constructing a building in such a way as to prevent floodwater entering the building and damaging its fabric. Flood resilience refers to constructing a building in such a way that, although flood water may enter the building, its impact is minimised (i.e. no permanent damage is caused, structural integrity is maintained and drying and cleaning are facilitated).

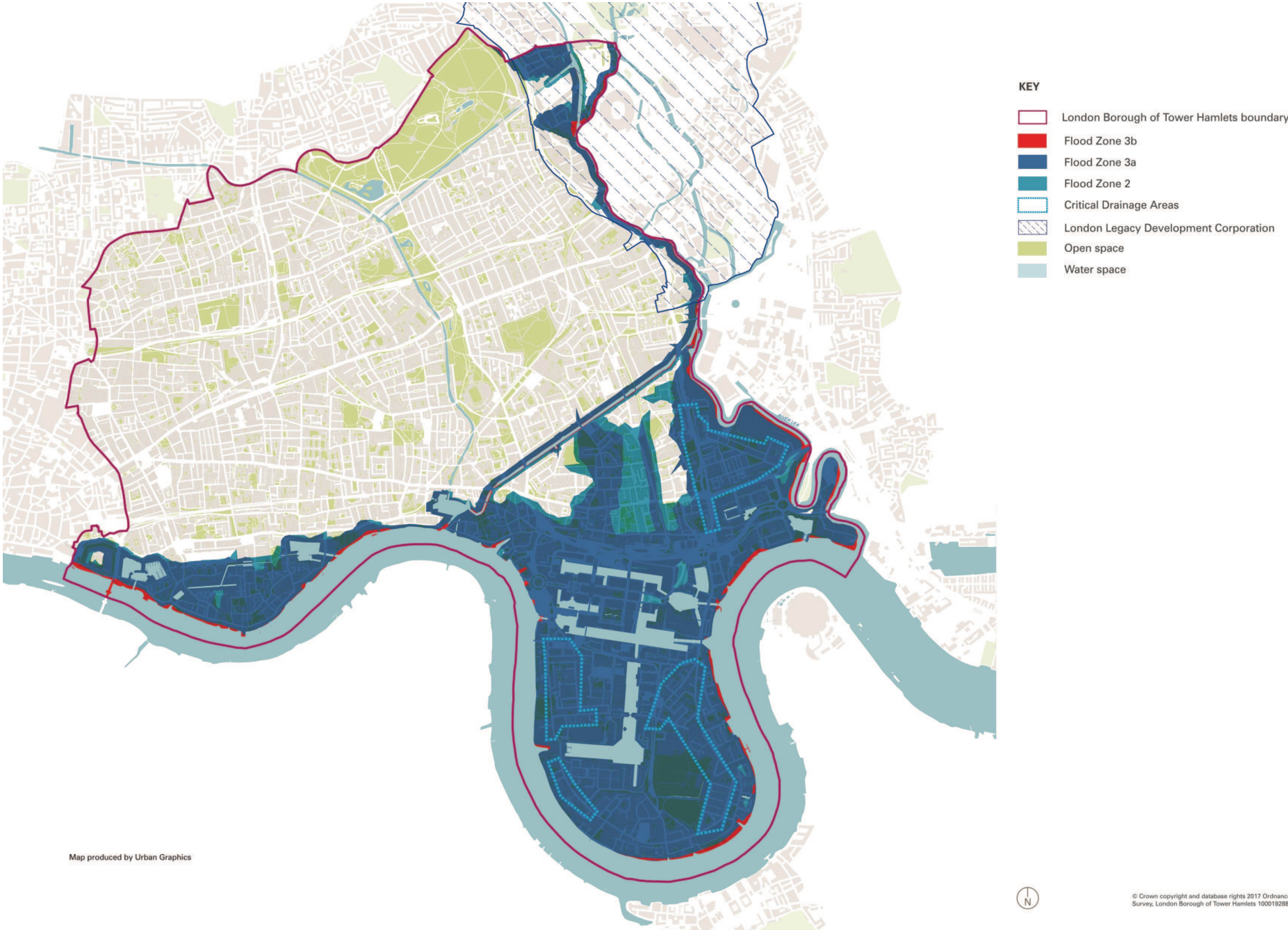
**9.35** Part 5 should also be considered alongside policy S.OWS1. The requirement to include an adequate buffer zone (see part 6) between waterways and developments applies to main rivers only (as identified

in the Tower Hamlets Strategic Flood Risk Assessment). It is to enable sustainable and cost effective flood risk management, including upgrading of river walls and embankments.

61 The sequential test has already been undertaken in the Tower Hamlets Site Allocation Sequential and Exceptions Tests (2017).



Figure 16 : Flood zones in Tower Hamlets



Map produced by Urban Graphics

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# 144 PART 3: POLICIES

**9.36** Where the preferred level of setback is unachievable, current and future flood risk must be alleviated to the satisfaction of the Environment Agency and through consideration of the specific recommendations of the Thames Estuary 2100 Plan. This can include:

- raising existing flood defences to the required levels in preparation for future climate change impacts or otherwise demonstrating how tidal flood defences can be raised in the future, through submission of plans and cross-sections of the proposed raising (in particular to demonstrate that the development does not preclude future raising of the defence in line with the Thames Estuary 2100 Plan);
- demonstrating improved access to existing flood defences and safeguarding land for future flood defence raising and landscape, amenity and habitat improvements;
- maintaining, enhancing or replacing flood defences to provide adequate protection for the lifetime of the development;
- where opportunities exist, re-aligning or setting back flood defence walls and improving the river frontage to provide amenity space, habitat, access and environmental enhancements; and
- requiring the delivery of flood risk management infrastructure and/or improvement measures that mitigate directly related impacts from the development, where these have been identified in the Tower Hamlets Infrastructure Delivery Plan.

**9.37** These setback requirements can also contribute towards opportunities for public access and recreation, as outlined in policy S.OWS1.

## Evidence links

- Tower Hamlets Strategic Flood Risk Assessment (2017)
- Tower Hamlets Local Biodiversity Action Plan (2015)
- Tower Hamlets Infrastructure Delivery Plan
- Thames Estuary 2100 (Environment Agency, 2011)

## Policy links

- Policy S.DH1: Delivering high quality design
- Policy S.DH3: Heritage and the historic environment
- Policy D.H5: Gypsies and travellers accommodation
- Policy S.OWS2: Enhancing a network of water spaces
- Policy D.OWS4: Water spaces

**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.
3. Development is required to achieve the following run-off rates:
  - a. New development in critical drainage areas is required to achieve a greenfield run-off rate and volume leaving the site.
  - b. All other development should seek to achieve greenfield run-off rate and volume leaving the site. Where this is not possible, the minimum expectation is to achieve at least 50% attenuation of the site's surface water run-off at peak times prior to re-development.

**Explanation**

- 9.38** A further source of flood risk is from surface water flooding. This arises following periods of intense rainfall when the volume and intensity of a rainfall event exceeds the capacity of the drainage system, resulting in localised flooding. Current critical drainage areas in the borough are in the Isle of Dogs, with other smaller areas of high surface water flood risk found throughout the borough. These are shown on the Policies Map and figure 16.
- 9.39** In order to reduce the amount of water being discharged from sites, this policy requires development to reduce the run-off from hard surfacing. When assessing the requirements of this policy consideration

will be given to the size, scale and nature of the development and whether relative provision has been made. Even minor development (e.g. rear extensions) have the ability to provide sustainable drainage measures.

- 9.40** Applicants are strongly encouraged to consider the requirements for sustainable urban drainage systems at the earliest opportunity, as this will enable their more effective integration and provision. Sustainable urban drainage systems should also be considered alongside the 'living building' requirements outlined in policy D.ES3, and green grid requirements outlined in policy S.OSW1, as sustainable urban drainage systems can also have biodiversity and urban greening benefits.
- 9.41** Applicants should demonstrate that they have considered different types of sustainable urban drainage systems, their ability to remove pollutants, their capacity and future maintenance.
- 9.42** In order to satisfy the requirements within parts 1 and 2, all major developments will be required to submit a drainage strategy alongside the original planning application. All other relevant developments will also be strongly encouraged to do so. The sustainable urban drainage systems hierarchy is outlined in more detail in the London Plan.
- 9.43** Infiltration sustainable urban drainage systems techniques should only dispose of clean roof water into clean, uncontaminated ground. They should not be used for foul discharges or trade effluent, and may not be suitable within source protection zone 1<sup>(62)</sup>.

**Policy links**

- Policy S.DH1: Delivering high quality design
- Policy D.OWS3: Enhancing the network of water spaces
- Policy D.OWS4: Water spaces

62 The Environment Agency has defined source protection zones: these are available to view from their website.

## Evidence links

- Sustainable Design and Construction Supplementary Planning Guidance (GLA, 2014)
- Tower Hamlets Strategic Flood Risk Assessment (2017)
- District Heating Manual for London (GLA, 2014)

## Policy D.ES6: Sustainable water management

1. Development is required to reduce water consumption: new residential developments must achieve a maximum water use of 105 litres per person per day and refurbishments and other non-domestic development should meet BREEAM water efficiency credits.
2. New development is required to minimise the pressure on the combined sewer network.
3. Major development is required to demonstrate that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve the development, taking into consideration the cumulative impact of current and proposed development.

## Explanation

**9.44** London is an area of serious water stress<sup>(63)</sup>. Developments should therefore seek to reduce the pressure on the fresh and waste water systems through increasing water efficiency. In recognition of this, part 1 requires all new residential developments to meet the national higher standard of 105 litres per person per day. BREEAM (Building Research Establishment Environmental Assessment Method) applies to non-residential developments, residential development arising from conversions and changes of use. This method provides a holistic assessment of the environmental sustainability of a development.

**9.45** Measures to achieve parts 1 and 2 could include the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on site. Major developments and high or intense water use developments, such as hotels, hostels and student housing, should include a grey water and rainwater harvesting system. Where such a system is not feasible or practical, development



must demonstrate to our satisfaction that this is the case. Developments are expected to submit a water efficiency calculator to demonstrate how they have met this requirement.

**9.46** In relation to part 3, major development (as defined in the glossary) is required to demonstrate that there is adequate capacity both on and off site to serve the development. It may be necessary to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity constraint and no improvements are programmed by the water company (Thames Water), the proposed development will be required to provide for the appropriate improvements, which must be completed prior to occupation of the development.

**9.47** Developments are strongly encouraged to contact Thames Water in advance of the submission of planning applications in order to ensure that the drainage requirements of development proposals are understood and that any upgrade requirements are identified.

**Policy links**

- Policy S.DH1: Delivering high quality design
- Policy S.OWS2: Enhancing the network of water spaces
- Policy D.OWS4: Water spaces

**Evidence links**

- Water Stressed Area – Final Classification (Environment Agency, 2013)

**Policy D.ES7: A zero carbon borough**

1. Development is required to meet the carbon dioxide emission reduction standards as set out below.

Table 5

Residential development	
Year	Improvement on the 2013 building regulations
2016-2031	Zero carbon (to be achieved through a minimum 45% reduction in regulated carbon dioxide emissions on-site and the remaining regulated carbon dioxide emissions to 100% - to be off-set through a cash in lieu contribution)

Table 6

Non-residential development	
Year	Improvement on 2013 building regulations
2016 – 2019	45% regulated carbon dioxide emissions reduction
2019 – 2031	Zero carbon (to be achieved through a minimum 45% reduction in regulated carbon dioxide emissions and the remaining regulated carbon dioxide emissions to 100% - to be off-set through a cash in lieu contribution)

2. Development is required to maximise energy efficiency based on the following standards:
  - a. All new non-residential development and non-self-contained residential accommodation over 500 square metres floorspace (gross) must meet or exceed BREEAM 'excellent' rating.
  - b. All major non-residential refurbishment of existing buildings and conversions over 500 square metres floorspace (gross) must

- meet at least BREEAM non-domestic refurbishment 'excellent' rating.
- c. As a minimum, all self-contained residential proposals will be strongly encouraged to meet the Home Quality Mark.
3. Major residential and major non-residential development will require an energy assessment. Minor non-residential development will be strongly encouraged to prepare an assessment.
  4. The energy assessment should demonstrate how the development has been designed in accordance with the energy hierarchy, especially how it will:
    - a. maximise energy efficiency as per the requirements set out in part 2;
    - b. seek to provide up to 20% reduction of carbon dioxide emissions through on-site renewable energy generation; and
    - c. outline the feasibility of low nitrogen dioxide decentralised energy.
  5. The sustainable retrofitting of existing development with provisions for the reduction of carbon emissions will be supported.

### Explanation

**9.48** In order to contribute towards the London Plan target of a 60% reduction of carbon emissions (below the 1990 level) by 2025, Tower Hamlets needs to reduce carbon dioxide emissions per person significantly more than most other London boroughs. Currently, Tower Hamlets is the third worst performing borough within London<sup>(64)</sup>. Since 2010, Tower Hamlets has only achieved a 22% reduction against this target<sup>(65)</sup>. This policy maintains our long term trajectory which has required progressive

reductions in carbon emissions from developments. This follows the London Plan's approach and is endorsed in the Housing Strategic Planning Guidance (GLA, 2016)<sup>(66)</sup>.

**9.49** Parts 1, 2, 3 and 4 of the policy seek to ensure that all new developments (including non-residential development) in Tower Hamlets contribute towards reducing carbon emissions. The policy also recognises that on-site carbon reductions have a greater impact on reducing carbon emissions than contributions in lieu. Funds raised through carbon offsetting (e.g. retrofitting) are spent on priorities outlined in the Tower Hamlets Carbon Offset Study (2016), as supported in part 4. Further information on carbon offsetting is available in the Planning Obligations Supplementary Planning Document.

**9.50** In relation to part 1, the improvements in carbon dioxide emission reductions within new build developments are based on building regulations requirements. Should the building regulations be updated during the lifetime of this plan, we will provide an update on the onsite reduction standards required. The requirement to reach zero carbon will remain. For refurbishment schemes, the baseline should be determined by modelling using building regulation compliance software to determine a building emission rate / dwelling emission rate of the regulated carbon dioxide emissions from the existing building before refurbishment<sup>(67)</sup>.

**9.51** Energy assessments should be informed by preliminary standard assessment procedures for residential developments or the national calculation method for non-residential development. Energy assessments should detail the measures included in the development and the carbon dioxide emission savings achieved at the time of implementing the relevant planning permission. To ensure we achieve our sustainability objectives, energy assessments for non-major development will also be sought.

**9.52** In relation to part 2, developments should consider how the design, layout, orientation, insulation materials and other sustainable construction techniques can contribute towards maximising energy efficiency.

64 UK Local Authority and Regional Carbon Dioxide Emissions 2005 – 2014 (National Statistics, 2016)

65 Tower Hamlets Carbon Policy Evidence Base (2016)

66 The importance and viability of this approach has been detailed in the Tower Hamlets Carbon Policy Evidence Base (2016).

67 The implementation dates for the requirements in part 1 are from 1<sup>st</sup> October 2016 for residential developments and from 1<sup>st</sup> October 2019 for non-residential developments.

**9.53** In addition, developments should implement at least the minimum standards set out in BREEAM (Building Research Establishment Environmental Assessment Method) applies to non-residential developments, residential development arising from conversions and changes of use. This method provides a holistic assessment of the environmental sustainability of a development. The Home Quality Mark is one way of demonstrating the standard of a new residential dwelling, which includes measures for low carbon dioxide, sustainable materials, good air quality and natural daylight. We strongly encourage schemes to use the Home Quality Mark. If BREEAM/Home Quality Mark is replaced or amended during the lifetime of the plan, the equivalent replacement requirements will be applied, subject to discussion with our sustainability service.

**9.54** In relation to part 4, new developments should be designed in a manner fully compatible with any existing or planned future decentralised energy network<sup>(68)</sup> in accordance with any relevant energy masterplan and the District Heating Manual for London (GLA, 2014) or equivalent replacement document (including appropriate design of building systems to minimise return temperatures). Developments must connect to the decentralised energy network if it is expected to be operational within five years of the development being completed.

**9.55** For the chosen solution for on-site renewable energy, applicants should provide details on:

- energy generated and the carbon dioxide saved;
- capacity and quantity of the proposed technology/ies; and
- location of the technology/ies marked on site plans.

**9.56** We will seek contributions from developers towards the costs of the decentralised energy network in line with the avoided costs of their own plant installation. Applicants will be expected to demonstrate the low air quality impacts of any decentralised energy network.

**9.57** In order to address part 5 the expected carbon reductions should be demonstrated within an energy assessment.

#### Policy links

- Policy D.SG5: Developer contributions
- Policy S.DH1: Delivering high quality design
- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality

#### Evidence links

- District Heating Manual for London (GLA, 2014)
- Housing Strategic Planning Guidance (GLA, 2016)

68 Please note: a district heating system is a type of decentralised heating network.

## Policy D.ES8: Contaminated land and storage of hazardous substances

1. Where development is proposed on contaminated land or potentially contaminated land, a desk study and site investigation in line with current guidance is required and remediation proposals agreed to deal with the contamination before planning permission is granted.
2. Development will not be supported which involves the storage or use of hazardous substances or which is located in close proximity to hazardous installations where it would cause a significant threat to health and the environment.
3. Certain contaminating developments, processes or land uses proposed within or in close proximity to sensitive locations, including source protection zones, may not be acceptable.

### Explanation

- 9.58** Part 1 of this policy provides additional guidance on protecting health of the borough’s residents and workers and the environment from contaminants and hazardous substances. This should be read in conjunction with the guidance set out in the London Plan (GLA, 2016).
- 9.59** Contaminated land is land that has been polluted with harmful substances to the point where it now poses an unacceptable risk to health and the environment. Tower Hamlets has a history of industrial land uses and we want to ensure that the impacts of these past and current land uses do not affect the health of people and the environment. We keep and update a public register of contaminated land (which is available from our website) and any site included in the register or any site which is potentially contaminated will be required to carry out a site investigation and agree a scheme of mitigation with us to ensure that contaminated land issues are considered at the planning application stage.

**9.60** A verification report will be required through condition in order to provide confirmation that the remediation work has been undertaken properly in line with best practice.

**9.61** Part 2 of the policy relates to the management of hazardous substances which are outlined in the Planning (Hazardous Substances) Regulations (2015). There are a small number of listed hazardous installations in or near to the borough. Hazardous substances are also controlled by the need for a separate hazardous substances consent. As such, it will be necessary to demonstrate that any developments which involve hazardous substances would not cause a significant hazard to the health and well-being of local residents or to the local environment.

**9.62** We will apply the Health and Safety Executive’s land use planning methodology in the event of a proposal being located near to a hazardous installation. In combination with advice provided by the Health and Safety Executive, consideration will also be given to site-specific circumstances and any proposed mitigation measures. If the Health and Safety Executive advise against development, planning permission will only be granted in circumstances where it can be demonstrated that the benefits arising from the proposed development would significantly outweigh the potential risks to health and the local environment.

**9.63** Source protection zones are spatial areas around public drinking water abstraction points. Locations of source protection zones are available on the Environment Agency’s website. Applicants are advised to speak to our environmental health service and the Environment Agency, where relevant.

### Policy links

- Policy D.SG4: construction of new development

**Evidence Links**

- Model Procedures for the Management of Land Contamination (CLR11) (Department for the Environment, Food and Rural Affairs & Environment Agency, 2004).
- Guidance for the Safe Development of Housing on Land Affected by Contamination (National House Building Council and Environment Agency, 2008).
- Sustainability of Soil and Groundwater Remediation (Homes and Community Agency, 2010).
- Development Industry Code of Practice V2 "The Definition of Waste" (CL:AIRE, 2011)

**Policy D.ES9: Noise and vibration**

1. Development is required to:
  - a. use the most appropriate, layout, orientation, design and use of buildings to minimise noise and vibration impacts;
  - b. identify/outline mitigating measures to manage noise and vibration from new development, including during the construction phase;
  - c. separate noise-sensitive development from existing operational noise; and
  - d. provide a noise assessment where noise-generating development or noise-sensitive development is proposed.
2. Where new noise-sensitive land uses are proposed in proximity to existing noise-generating uses, such as cultural and entertainment venues, development is required to robustly demonstrate how conflict with existing uses will be avoided, through mitigation measures.
3. Development is required to demonstrate that the level of noise emitted from any new heating or ventilation plant will be below the background level by at least 10dBA.

**Explanation**

- 9.64** This policy seeks to manage noise and vibration from new development and manage existing sources of noise on sensitive development.
- 9.65** Noise and vibration can have a major effect on local amenity and well-being: the World Health Organisation, for example, states that excessive noise can seriously harm human health, disturb sleep and have cardiovascular and behavioral effects.
- 9.66** The increasingly high-density and mixed-use nature of development in Tower Hamlets means it is essential that building design and use minimises noise pollution and disturbance. Part 1 therefore sets out

measures to minimise noise from new development and separate noise-sensitive uses such as housing, hospitals and schools from existing noise sources to protect the amenity and well-being of the area.

**9.67** In particular, the noise assessment should include the following.

- Source and absolute level of the noise together with the time of day it occurs.
- For non-continuous sources of noise, the number of noise events, and the frequency and pattern of occurrence of the noise.
- Pitch and tone of the noise.
- The cumulative impacts of more than one source should be taken into account along with the extent to which the source of noise is intermittent and of limited duration.
- In cases where existing noise sensitive locations already experience high noise levels, a development that is expected to cause even a small increase in the overall noise level may result in a significant adverse effect.

**9.68** Where the avoidance of noise conflicts is impractical, mitigation measures such as effective sound-proofing for noise attenuation (e.g. noise absorbing cladding) and restrictions on operating hours will be implemented through appropriate planning conditions.

**9.69** There have been a number of examples across London of long-standing entertainment venues closing or becoming at risk of closure due to a combination of factors, including noise complaints from new residents and venues being purchased for redevelopment (particularly for housing). This has implications for the long-term future of London's creative and cultural sector which has an impact not just on residents but also its tourism potential<sup>(69)</sup>. Part 2 uses the agent of change principle to seek to reduce this phenomenon. Applicants must submit detailed noise assessments and demonstrate that noise levels within the proposed development emitted from nearby uses would be at an acceptable level. Where we are not satisfied that the operations of nearby uses would not be compromised, applications will be refused.

**9.70** Part 3 sets out that heating and ventilation plants should be designed so that they do not adversely affect nearby amenities, including open spaces which are valued for their quiet environment.

**9.71** Appendix 6 explains how this policy will be implemented in greater detail.

### Policy links

- Policy D.SG4: Construction of new development
- Policy S.DH1: Delivering high quality design
- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality
- Policy D.CF4: Public houses

### Evidence links

- Climate Change and Adaptation Strategy (GLA, 2011)



**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.

**Explanation**

- 9.72** Climate change is causing increased occurrence of overheating, which can cause significant discomfort to residents and building users. Relying on air-conditioning systems to cool buildings can be very energy intensive, ineffective and can also cause discomfort to building users. Large developments in particular have the potential to alter the local climate. For example, a light coloured building that reflects heat will stay cool on the inside and the outside, whereas a dark building will absorb heat during the day to raise internal temperatures and slowly release this heat as the temperature cools keeping the local air temperature warmer. Internal air-conditioning systems also produce heat which increases the outside temperature and adds to the heat island effect.
- 9.73** Major development schemes are expected to evidence compliance with this policy within their design and access statements. Details should include the measures used to avoid overheating (including overheating analysis against a mid-range climate scenario for the 2030s) and excessive heat generation. This should look at not only the physical form of the building but also the operation of the building.
- 9.74** This policy should be read alongside the London Plan (GLA, 2016), which sets out a cooling hierarchy that indicates the cooling methods to be used in the design process, starting with minimising internal heat generation and the amount of heat entering a building in the summer through energy efficient design, including orientation, shading, fenestration, insulation and green roofs and walls. Subsequent methods include thermal mass and high ceilings, passive and mechanical ventilation and low-carbon active cooling systems.

**Policy links**

- Policy D.SG2: Construction of new development
- Policy S.DH1: Delivering high quality design
- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality

**Evidence links**

- Climate Change and Adaptation Strategy (GLA, 2011)

## Chapter 10: Managing our waste

### Introduction

- 10.1** The management of waste is one of the most pressing issues facing Tower Hamlets. The borough will have significant growth in the coming decades and with this comes a greater need to reduce, recycle and recover more waste and divert it away from landfill.
- 10.2** Tower Hamlets is a unitary waste planning authority, waste collection authority and waste disposal authority. In our capacity as a waste planning authority, we have a statutory duty to prepare a waste local plan in line with legislation<sup>(70)</sup>. This is being fulfilled through the inclusion of waste policies in the Local Plan<sup>(71)</sup>.
- 10.3** The Local Plan must identify sufficient opportunities to meet the identified needs of an area for the management of waste, aiming to drive waste management up the waste hierarchy (see figure 17). We have to plan for seven waste streams<sup>(72)</sup>, including household, business and construction waste. In particular, the London Plan requires boroughs to identify existing facilities and suitable land to provide enough capacity to manage the tonnages of household and business waste apportioned in the London Plan (GLA, 2016). This policy is to enable London to be net self-sufficient in managing these waste streams by 2026. Tower Hamlets has been apportioned the following tonnes of waste:

Table 7 : Housing, commercial and industrial waste requirements. Source: London Plan (GLA, 2016)

	2021	2026	2031	2036
Household and commercial/industrial waste arisings (tonnes per annum)	248,000	252,000	256,000	261,000
London Plan apportionment (tonnes per annum)	252,000	302,000	307,000	313,000

- 10.4** The apportionment figures are higher than the total amount of waste predicted to arise in the borough. The London Plan is currently being reviewed and the borough's apportionment targets may change as a result. Achieving these targets presents a particular challenge because parts of the borough are densely built-up and there are competing pressures from higher value land uses, such as housing and employment.
- 10.5** There is not enough capacity within existing waste facilities in the borough to meet our waste needs. To meet the apportionment targets for household and business waste, Tower Hamlets will safeguard existing waste sites (policy S.MW1.1) and identify land suitable for new waste facilities under policy S.MW1. It has been calculated that between 3.65 and 5.27 hectares of land is required to meet the capacity gap up to 2036, and it is estimated that 5.28 hectares of land will come forward within the areas of search for new waste sites (see policy S.MW1) through business turnover and vacancies<sup>(73)</sup>. The borough is not allocating individual sites for waste but identifying areas within which individual sites could come forward; this approach is supported by both

70 Article 28 of the Waste Framework Directive (2008)

71 A waste data study has been produced to support these policies (Tower Hamlets Waste Management Evidence Base Review, 2017).

72 Municipal/household waste; commercial/industrial waste; construction/demolition waste; low level; radioactive waste; agricultural waste; hazardous waste; and waste water waste.

73 Tower Hamlets Waste Management Evidence Base Review (2017)



national policy and the waste industry. The total amount of suitable industrial land in the borough is just under 22 hectares. We will continue to monitor the provision of new waste capacity over the course of the plan period. Where any loss of capacity occurs with the delivery and monitoring framework set out in table 17 in section 5.

**10.6** The figures below demonstrate that Tower Hamlets can meet its apportionment targets through existing sites and identifying enough land suitable for new waste facilities. The ranges shown denote the differences in throughput per hectare for each type of facility/technology.

Table 8 : Waste capacity forecasts and land requirements

	2021	2026	2031	2036
Existing apportionment capacity (tonnes)	51,874	51,874	51,874	51,874
Potential capacity from vacant safeguarded waste sites* (tonnes)	23,850 - 34,450	23,850 - 34,450	23,850 - 34,450	23,850 - 34,450
Capacity gap* (tonnes)	165,676 – 176,276	215,676 – 226,276	220,676 – 231,276	226,676 – 237,276
Additional land required (hectares)	2.55-3.92	3.32-5.03	3.40-5.14	3.49-5.27
Additional land identified (hectares)	5.28	5.28	5.28	5.28

\*Please note: it is assumed that the throughput of each site could range between 45,000 and 65,000 tonnes per hectare per annum.

**10.7** Areas listed in policy S.MW1 below have been identified as suitable for new waste facilities primarily due to the industrial nature and access to the strategic transport network so that waste and vehicle movements can avoid local roads and protect the safety and amenity of residents and heritage assets. Areas of search are not solely designated for waste management purposes and are also suitable, in principle, for other uses that are considered appropriate for their respective policy designations.

**10.8** There is also a capacity gap for construction, demolition and excavation waste in the borough. Around 80% of this waste is currently managed on site and 70% of the remainder goes to landfill. Through policy S.MW1, Tower Hamlets is seeking to increase the proportion of construction, demolition and excavation waste which is reused and recycled to 95% by 2020, in line with the London Plan. Nevertheless, some construction, demolition and excavation waste will continue to be exported to landfill in the wider south east region throughout the plan period and we will liaise with recipient waste planning authorities on an on-going basis to monitor these waste movements.

**10.9** Tower Hamlets is also required to plan for hazardous waste, waste water, agricultural waste and low-level radioactive waste. The evidence concludes that no additional facilities are required within the borough for these waste streams because they are only produced in very small quantities and/or they are managed at specialist facilities outside the borough.

**10.10** Any proposals for new or extended waste facilities in Tower Hamlets will be assessed against criteria in the National Planning Policy for Waste, the London Plan and Local Plan policies. The London Legacy Development Corporation is the planning authority for part of the borough of Tower Hamlets but it does not have a separate apportionment. We are therefore planning for waste across all of its administrative area. We will continue to work closely with the London Legacy Development Corporation on delivering our strategic plan for waste.

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**10.11** Our duties as a waste collection authority and waste disposal authority include helping households to prevent waste as well as reuse items and recycle as much waste as possible. The London Plan has set a target for London as a whole to exceed 50% in recycling/composting levels by 2020 and 60% by 2031. It also sets a target of recycling and composting at least 70% of London’s commercial and industrial waste by 2020, maintaining these levels to 2031. Whilst London boroughs have not been set individual targets for recycling these waste streams, Tower Hamlets is working towards meeting the London-wide target. The design of new developments are required to ensure integrated waste collection and bulking systems are included which contribute to the borough’s ability to implement the waste hierarchy and increase recycling/composting rates (see policy D.MW3).

**10.12** The London Plan is seeking to move towards a future where goods are designed to be reused and recycled and very little waste will require disposal in the future (a ‘circular economy’). Tower Hamlets will contribute to this approach in various ways (for example, new developments will be required to recycle and reuse construction materials - see policy S.MW1).

**10.13** This section contains the following policies.

- Policy S.MW1: Managing our waste
- Policy D.MW2: New and enhanced waste facilities
- Policy D.MW3: Waste collection facilities in new development

Figure 17 : Waste hierarchy



**Policy S.MW1: Managing our waste**

- The following existing waste sites within Tower Hamlets (as shown on the Policies Map) are safeguarded for waste use over the plan period.

Schedule 1: Existing waste sites in Tower Hamlets

Name	Other designations	Site area (ha)	Operational capacity / contribution to apportionment (tonnes per year)
Clifford House, Towcester Road	Strategic Industrial Location	0.46 (0.144 which is currently involved in waste management to be safeguarded)	418 / 0
Northumberland Wharf, Yabsley street	Safeguarded Wharf	0.88	111,243 / 2,654
Ailsa Street <sup>(74)</sup>	Ailsa Street: site allocation	0.53	0 / 23,850 – 34,450 (potential)

- The following are existing waste sites in the London Legacy Development Corporation area (LLDC) and will be subject to planning policies in the LLDC Local Plan.

Schedule 2: Existing waste sites in LLDC

Name	Other designations	Site area (ha)	Operational capacity / contribution to apportionment (tonnes per year)
McGrath House, Hepscott Road	Hepscott Road site allocation	1.47	73,064 / 10,539
455 Wick Lane	Strategic Industrial Location: Preferred Industrial Location	0.47 (0.027 currently used for waste purposes ancillary to civil engineering works)	0 / 36,958

- Development which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported.
- Applications for non-waste uses on safeguarded sites will only be permitted where it is clearly demonstrated that compensatory capacity will be delivered on a suitable replacement site within the borough in the first instance or another part of London which provides equivalent to, or greater than the maximum annual throughput that the existing site can achieve.
- Development that prevents or prejudices the safeguarding of these sites will only be supported where alternative waste capacity provision is made.
- Areas in schedules 3 and 4 (below) are considered suitable for new waste facilities (as shown on the Policies Map).

74 Ailsa Street is a safeguarded waste site but is not currently operational. Its contribution towards apportionment targets is based on average throughputs per hectare, depending on the facility/technology.

Schedule 3: Areas of search for new waste sites in Tower Hamlets

Name	Other designations	Site area (ha)	Waste facility type	Operational capacity / contribution to apportionment (tonnes per year)
The Highway	Local Industrial Location	2.71 (an estimated 0.65 to become available over the plan period)	Reuse / refurbishment / repair	29,250 – 42,250
Empson Street	Strategic Industrial Location	0.07 (an estimated 2.42 to become available over the plan period)	Recycling, composting or recovery	108,900 - 157,300

Schedule 4: Areas of search for new waste sites in LLDC

Name	Other designations	Site area (ha)	Waste facility type	Potential contribution to the apportionment (tonnes per year)
Fish Island	LLDC Local Plan: Strategic Industrial Location	9.21 (an estimated 2.21 to become available over the plan period)	Recycling, composting, recovery	99,450 - 143,650

7. Integrated waste facilities within new developments outside of areas of search in schedules 3-4 may be acceptable where they contribute to managing apportioned waste and are of a scale and nature that does not compromise adjacent existing and proposed land uses.
8. New development will be expected to reuse and recycle construction, demolition and excavation waste on or close to the site where it arises.

### Explanation

**10.14** This policy seeks to develop a well-planned and integrated network of waste management facilities across the borough to address future capacity needs and contribute towards managing waste generated within the borough over the plan period.

**10.15** Meeting this need will require both waste facilities on existing sites (operational and non-operational) and new facilities in areas of search and other suitable locations which comply with the criteria set out in policy D.MW2. Waste facilities within the areas of search will be directed towards the most suitable locations within these areas to make sure that they are as far away as possible from sensitive receptors (such as residential uses, schools and health facilities) and/or mitigation measures

are provided to ensure any significant detrimental environmental and amenity impacts can be adequately addressed. Where existing facilities can be enhanced to maximise their use, this will be encouraged.

**10.16** The London Legacy Development Corporation is the planning authority for those sites and areas of search within its boundary (as defined on figure 5). The London Legacy Development Corporation Local Plan (2015-2031) safeguards existing waste sites (listed in schedule 2) and identifies areas of employment land suitable for waste uses (listed in schedule 4). To secure the delivery of an effective waste plan for the borough, Tower Hamlets and the London Legacy Development Corporation agree that the area of search listed in schedule 4 above is potentially suitable for waste management use. Acceptability of proposals for waste management uses in those locations will be determined with reference to policies within the London Legacy Corporation Local Plan and any other relevant material considerations that apply to that proposal. Any applications for planning permission in these locations will need to be submitted to the London Legacy Development Corporation as the local planning authority governing the area.

**10.17** Some existing safeguarded waste sites (McGrath House and Ailsa Street) are within areas of regeneration and may be released for other uses, providing the requirements set out within policy S.MW1 (see part 4) are met<sup>(75)</sup>.

**10.18** Compensatory capacity will be sought which is equivalent or greater than the maximum annual throughput over the last five years, as per the Environment Agency's Waste Data Interrogator. Compensatory provision should be provided locally. The area of search for a replacement site or increased capacity within an existing facility should be within Tower Hamlets in the first instance, or failing that, elsewhere in London. Compensatory provision will usually be secured through conditions and/or a legal agreement at the planning permission stage.

**10.19** Competition for land means the borough has to look beyond traditional industrial locations when seeking space for waste facilities. There is an opportunity for innovative technologies to be incorporated into new

development to manage some of the waste generated over its lifetime. Part 7 of the policy therefore allows modern waste facilities to be integrated within suitable new development outside the areas of search. Integrated waste facilities which come forward are likely to be small-scale due to the constrained nature of many sites, and will be assessed on a case-by-case basis against criteria in policy D.MW2 and regional and national policies.

**10.20** On-site materials processing systems for food are an important aspect to consider in this borough due to the particular challenges to collection services within blocks of flats. The principle of these systems is two-fold.

- To carry out preliminary processing of raw materials at source, thereby reducing the tonnage and volume of solid waste to be managed and the subsequent burden on collection services.
- To make use of valuable end products, such as unlocking the energy held within the waste material itself.

**10.21** There are a number of pieces of equipment, which may provide appropriate on-site waste processing including, but not limited to, micro anaerobic digesters.

**10.22** The flexibility of these systems is such that it reduces the need to separate collections of food waste to be carried out within the development and thereby reducing vehicle movements. Where systems such as anaerobic digesters are proposed, it will be the responsibility of the managing agent to maintain the system/facility. An agreement will also need to be made with us with regards to how the waste is accounted for in terms of contributing to our apportionment targets prior to permission being granted.

**10.23** Integrated waste collection systems are also required for new developments under policy D.MW3. We will also consider the allocation of community infrastructure levy contributions towards provision of strategic waste management facilities.

75 The McGrath site at Hepscoth Road in Fish Island is also a site allocation within the LLDC Local Plan for mixed-use development. Ailsa Street is located within the Poplar Riverside Housing Zone.

**10.24** For part 8 of the policy, developers should submit a plan for on-site waste to demonstrate how much construction, demolition and excavation waste will be reused and recycled, taking account of the London Plan target of 95%. The sustainable transportation of waste (by water and rail) will be assessed as part of policy D.MW2 (see part 1 - f).

**10.25** All sites and areas mentioned under policy S.MW1 are shown on the relevant policies maps for Tower Hamlets and the London Legacy Development Corporation.

## Policy links

- Policy S.DH1: Delivering high quality design
- Policy D.DH8: Amenity
- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES2: Air quality
- Policy D.ES4: Flood risk
- Policy D.ES5: Sustainable drainage
- Policy S.TR1: Sustainable travel

## Evidence links

- Environment Agency Waste Interrogator

## Policy D.MW2: New and enhanced waste facilities

1. Proposals to construct a new waste facility or replace or extend an existing waste facility will be supported where:
  - a. it contributes towards the aims of sustainable waste management in line with the waste hierarchy;
  - b. it is located within a safeguarded waste site or area of search or integrated into a suitable new development;
  - c. it incorporates a high quality design, is of a scale and nature which integrates into its surroundings and ensures compatibility with adjacent existing and proposed land uses (including within neighbouring boroughs);
  - d. it co-locates with other compatible uses (including existing waste facilities);
  - e. it proposes technology which is suitable for the location and nature of the site;
  - f. it has good access to the strategic transport network, including, where possible, rail and canal/river links that offer the potential to transport waste;
  - g. there is adequate road capacity to accommodate any vehicle movements generated and that vehicles can enter, wait, unload and leave the site without prejudicing the safety of pedestrians and other vehicles;
  - h. it provides effective on-site measures to ensure safety and security;
  - i. it is enclosed, unless it can be demonstrated that environmental and amenity impacts, including the emission of air pollutants, noise, vibration, dust, glare, vermin, odours can be mitigated, both during and after operations; and
  - j. it incorporates measures to minimise carbon emissions and maximise the use of lower-carbon energy sources.



**Explanation**

- 10.26** This policy relates to new waste management facilities (including those replacing or expanding existing sites as well as capacity on sites) and seeks to direct them towards the most appropriate and sustainable locations which maximise the efficient use of the land and do not have any unacceptable visual, environmental and transport impacts.
- 10.27** New waste management facilities will be directed towards existing safeguarded sites and areas of search (as set out in policy S.MW1). In other locations, such facilities will still be expected to meet the criteria set out in policy D.MW2 as well as any other relevant policies within the plan.
- 10.28** Developments providing additional waste management capacity will be encouraged to co-locate alongside other waste facilities and other compatible uses without having any significant detrimental impacts on the amenity and function of the immediate and surrounding area to optimise the potential of sites and address the intensification of land uses (as per part d) .
- 10.29** The types of waste technology that will be suitable will depend on the nature and scale of the proposed scheme and the characteristics of the site and its surroundings, as required under part e. Broad types of facility suitable for each area of search are set out in the schedule of areas in policy S.MW1. These are likely to be small-scale facilities due to the constrained nature of the borough.
- 10.30** Part f seeks to ensure applicants demonstrate that opportunities to transport both construction and operational waste from the site via rail and water are explored (including shared facilities at existing railheads, wharves and depots) as a means to reduce congestion and vehicular movements on the road network. Information on sustainable transportation of waste should be submitted as part of the planning application, alongside details of re-use and recycling of waste arising during the construction phase in line with policy S.MW1 (see part 8).
- 10.31** Part i seeks to mitigate adverse air quality impacts associated with waste facilities. Waste management facilities should be enclosed and covered on all vertical sides with small access and egress points, fitted with

fast-acting doors, and incorporate an air filtering system to reduce airborne particulate concentrations in and outside of the building in line with Environment Agency advice. This provides an effective way of controlling dust and particulate pollution within waste developments. In cases where enclosure is not possible, proposals must provide details of proposed measures demonstrating how the control measures can adequately mitigate these impacts. Operators will be expected to obtain the appropriate Environment Agency permits and meet the conditions of those permits.

- 10.32** In order to minimise the impact on climate change, waste management facilities should incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power (see part j above). In instances where this is not feasible, an energy statement must be submitted with the planning application demonstrating that it is not technically feasible or economically viable.

**Policy links**

- Policy D.SG5: Developer contributions
- Policy S.DH1: Delivering high quality design
- Policy D.DH8: Amenity
- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES2: Air quality
- Policy D.ES4: Flood risk
- Policy D.ES5: Sustainable drainage
- Policy S.TR1: Sustainable travel
- Policy D.TR2: Impacts on the transport network

**Evidence links**

- Environment Agency Waste Interrogator

## Policy D.MW3: Waste collection facilities in new development

1. All new development must include sufficient 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 mass waste collection systems that do not include traditional methods of storage and collection and are compatible with our waste collection methods outlined in appendix 4. In instances where this is not practicable, supporting evidence must be submitted with the application to demonstrate this.

### Explanation

**10.33** This policy will help to ensure that waste is collected and managed in a sustainable manner in line with the principles of the waste management hierarchy as set out in figure 17. It is also intended to increase the amount of waste which can be recycled and composted from all developments, and to improve waste collection systems in developments with communal waste facilities. Tower Hamlets is working towards meeting the London Plan target of recycling/composting 50% of household waste by 2020 and 60% by 2031. In 2015, only 27% of household waste was reused, recycled or composted in Tower Hamlets and this needs to increase.

**10.34** This policy seeks to ensure that dry recyclables, organics and residual waste can be segregated, and for residential developments bulked at source within new developments to:

- minimise transport movements from waste collection operations;
- minimise the financial and operational burden on existing waste collection system;
- maximise efficient use of collection resources;
- encourage recycling behaviour by residents and reduce contamination of recyclables collected; and
- make a positive impact on the quality of the street scene.

**10.35** Incorporating sufficient waste storage capacity within new developments should be done from the outset to avoid capacity shortfalls or inadequate services. Applicants will need to forecast how much organic, recyclable and residual waste will be generated when the development is occupied and demonstrate that sufficient space has been allocated to the storage and/or bulking of this waste in both individual units and for the development as a whole.

**10.36** Tower Hamlets is seeking to move away from the traditional waste storage methods, such as standard wheeled bins, bagged collections and Euro bin containers, towards mass waste collection systems particularly for residential developments that require communal waste collection facilities. Using larger containers than standard bins and communal Euro bins, means more waste can be stored before needing collection and more waste can be collected in a single round. As a general rule, all of the systems using bulk containers allow waste to be stored in a smaller footprint than standard communal Euro bins. The location of storage containers should be chosen to maximise operational convenience and minimise environmental, amenity and transport impacts.

**10.37** Under part 2 of the policy, new major residential developments will be expected to incorporate mass waste collection systems that do not incorporate the traditional storage and collection and are compatible with our waste collection services. Such systems could include compactors, underground storage containers, vacuum systems and automated waste collection systems. These systems require land to be set aside to store bulked waste materials, with the size and footprint of the space varying from system to system. Preference should be given to systems that can provide for a weekly collection service as a minimum and can collect organic wastes separately or facilitate onsite composting. Applicants should discuss options with our team that manages waste collection prior to the submission of an application.

**10.38** In instances where it is not practicable or we consider it inappropriate for non-traditional waste collection systems to be incorporated within the development, the developer or managing agent will have to provide adequate space as well as collection containers that are in accordance with our waste management requirements set out in appendix 4.



**10.39** Planning applications should clearly set out the access route of the occupiers and the servicing vehicles, including a clear swept path in accordance with our waste collection specifications, and access arrangements to container stores. The waste storage area must be designed to ensure that refuse vehicles are able to enter and exit the highway in a forward gear and perform all collection activities within the curtilage of the site. Applicants are advised to contact our team that manages the collection of waste prior to submitting a planning application and adopt a collaborative approach to ensure these arrangements are in line with our waste collection services. Further advice is available in appendix 4.

**10.40** In the case of large-scale development (i.e. 100 or more residential units or 20 or more Euro container bins), applications should be accompanied by a recycling and waste management strategy which considers the above matters and demonstrates the ability to meet local authority waste management targets, and demonstrate compliance with the standards set out in appendix 4.

#### Policy links

- Policy S.DH1: Delivering high quality design
- Policy D.DH8: Amenity
- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES2: Air quality
- Policy D.ES4: Flood risk
- Policy D.ES5: Sustainable drainage
- Policy S.TR1: Sustainable travel
- Policy R.TR2: Impacts on the transport network

#### Evidence links

- Waste Management Planning Advice for New Flatted Properties (London Waste and Recycling Board, 2014)

## Chapter 11: Improving connectivity and travel choice

### Introduction

**11.1** Tower Hamlets is a well-connected part of London; it enjoys an extensive public transport network and will benefit from improvements to the Docklands Light Railway and London Underground as well as the opening of the Elizabeth line stations at Whitechapel and Canary Wharf (as set out in figure 18 overleaf). However, planned growth in new homes and jobs, coupled with London's overall growth, will significantly increase resident, commuter and freight movement within and through the borough. This will create further pressure on the transport network which is already at or close to saturation in many parts of the borough at peak times, as well as adversely affecting air quality and the natural environment.

**11.2** As a result, congestion and overcrowding of the transport network are amongst the most significant challenges facing Tower Hamlets, which have the potential to significantly affect development density and economic activity in the borough. Growth is dependent on the successful implementation of a first-class sustainable transport network to move people, goods and services. Planned improvements will go some way to alleviate pressure on the existing network, but recent studies have identified that further investment in infrastructure will be required to support the level of growth which is expected to come forward during the plan period<sup>(76)</sup>. In addition, the health implications of physical inactivity is also an important local issue, which the promotion of active travel can help to address in accordance with the Mayor of London's 'healthy streets' initiative.

**11.3** These factors underscore the importance of delivering a more connected and efficient transport network across Tower Hamlets that supports the population, reduces the need to travel and incentivises a modal shift to cycling, walking and public transport. Development must manage its

impact on the entire network to ensure it contributes positively to the health and well-being of residents, employees and visitors across the borough.

**11.4** This section contains the following policies.

- Policy S.TR1: Sustainable travel
- Policy D.TR2: Impacts on the transport network
- Policy D.TR3: Parking and permit-free
- Policy D.TR4: Sustainable delivery and servicing

**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;
  - b. be integrated effectively alongside public transport, walking and cycling routes to maximise sustainable travel across the borough;
  - c. be focused within areas with high levels of public transport accessibility and/or town centres, in respect of developments generating significant levels of trips; and
  - d. not adversely impact the capacity, quality, accessibility and safety of the transport network in the borough.
2. Where appropriate, development must support and safeguard land for transport and freight infrastructure enhancements to meet the demands arising from future growth, including improvement to capacity, connectivity, quality and interchanges across the network.

**Explanation**

**11.5** In order to address the significant issues surrounding highway congestion, poor air quality and capacity constraints across the public transport network, a number of strategic and local transport improvements are underway or planned. However, further infrastructure investment will be required to accommodate the predicted population and employment growth, and in some locations, development could be significantly hindered without appropriate enhancements to the transport network.

- 11.6** Tower Hamlets has low car ownership ratio with only 37% of households owning one or more cars, compared to 43% across London<sup>(77)</sup>. This correlates with travel-to-work data which indicates that residents favour sustainable modes, such as public transport (60%), walking or cycling (26%). The level of journeys to work by car, at 12%, is lower than the London average, at 30%<sup>(78)</sup>. This reinforces the need for developers to prioritise sustainable travel in the design and delivery of their schemes, particularly walking, cycling and public transport, helping to relieve congestion, reduce air pollution and improve journey times.
- 11.7** This policy seeks to manage growth to ensure it does not increase traffic congestion and crowding on public transport due to trip generation from developments as well as through-trips. The location of development close to services and amenities; integration with the transport network; prioritising the most sustainable forms of travel; and facilitating and enabling behaviour change away from car use are crucial factors in accommodating the predicted population and economic changes over the plan period.
- 11.8** Part 1 (a) promotes walking, cycling and public transport as a primary means of travelling. In order to ensure compliance with green grid policies (S.OWS1 and D.OWS3), development should incorporate an improved pedestrian and cycling environment that is safe, accessible and permeable both within the borough and into neighbouring boroughs. It also identifies the necessity to link development to the borough's cycling network in accordance with the borough's adopted cycle strategy, particularly strategic cycle routes, as well as access to river transport (see figure 19), where possible.
- 11.9** Part 1 (b) ensures that development supports the use of and connects to public transport, cycling and walking facilities that surround the site. The design, management and operation of a development should encourage its users to travel in a sustainable manner; it should also be permeable and provide links to existing or planned infrastructure as well as relevant on-site infrastructure, such as bicycle storage, workplace showers and changing facilities.

77 Travel in London, Report 9 (Transport for London, 2016) - 2015/16 figure.

78 Tower Hamlets Strategic Transport Assessment (2016) – 2011 census

**11.10** Part 1 (c) identifies the need for development to be located in an area appropriate to the trips it generates. The scale of any development must reflect the level of public transport available. Transport for London (TfL) has mapped the Public Transport Accessibility Levels (PTAL) across the whole of London; this is a measure of connectivity to the public transport network. In Tower Hamlets, ratings range from highly accessible areas - such as Canary Wharf, Whitechapel, Bethnal Green, Bow and Mile End - to areas with lower levels of public transport accessibility, including parts of the Lower Lea Valley. The scale of development should also have regard to the town centre hierarchy set out in policy S.TC1, whereby development densities should consider the availability of nearby shops, services and amenities, thereby reducing the need to travel.

**11.11** Part 1 (d) seeks to ensure that development does not cause an undue detrimental impact to the safety and efficient operations of existing transport networks, once appropriate mitigation measures have been taken into account. In particular, it is important that development does not:

- compromise the safety of the highway user and/or the ability of public transport providers to safely operate services;
- increase demand on the borough's transport networks beyond operational limits and/or capacity;
- bring about a reduction in the quality of stations, stops or services; or
- restrict access to the same services.

**11.12** Development is expected to be well-integrated with the public transport network and contribute to its efficient running and service improvements. Developers should ensure they engage early with relevant bodies (e.g. Transport for London) in order to establish the likely impacts and/or appropriate mitigation measures to be funded through developer contributions in accordance with policy D.SG5.

**11.13** Part 2 identifies the role of development in supporting improvements and enhancements to the borough's transport and freight infrastructure (including safeguarded wharves and consolidation centres). Applicants

should work with us to support planned and future transport initiatives that underpin new growth; and any development that adversely affects or planned infrastructure improvements will not be supported.

**11.14** We will work in partnership with neighbouring boroughs, Transport for London and other agencies (e.g. Highways England) to understand and address the future transport needs of the borough. A number of interventions (see figure 18) are required to support the borough's transport network, including<sup>(79)</sup>:

- the delivery of the Elizabeth line;
- enhancements to bus services and the Dockland Light Railway;
- improved river services and potential new piers at Wapping, Canary Wharf East and Trinity Buoy Wharf;
- new cycle infrastructure, including the Mayor of London's cycle hire network; and
- new pedestrian and cycle connections, including a new pedestrian and cycle river crossing between Canary Wharf and Rotherhithe and other river crossings.

**11.15** The list is not exhaustive and new interventions will arise from other transport strategies and assessments alongside regional policies, such as the Mayor of London's Vision for Cycling in London, the Mayor of London's Transport Strategy and Transport for London's own infrastructure delivery plans. Development may also be required to contribute financially towards new transport infrastructure and improvements in accordance with policy D.SG5.

### Policy links

- Policy S.SG1: Areas of growth and opportunity within Tower Hamlets
- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG4: Construction of new development
- Policy D.SG5: Developer contributions
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy S.TC1: Supporting the network and hierarchy of centres

79 These are identified in the Tower Hamlets Strategic Transport Assessment (2016).

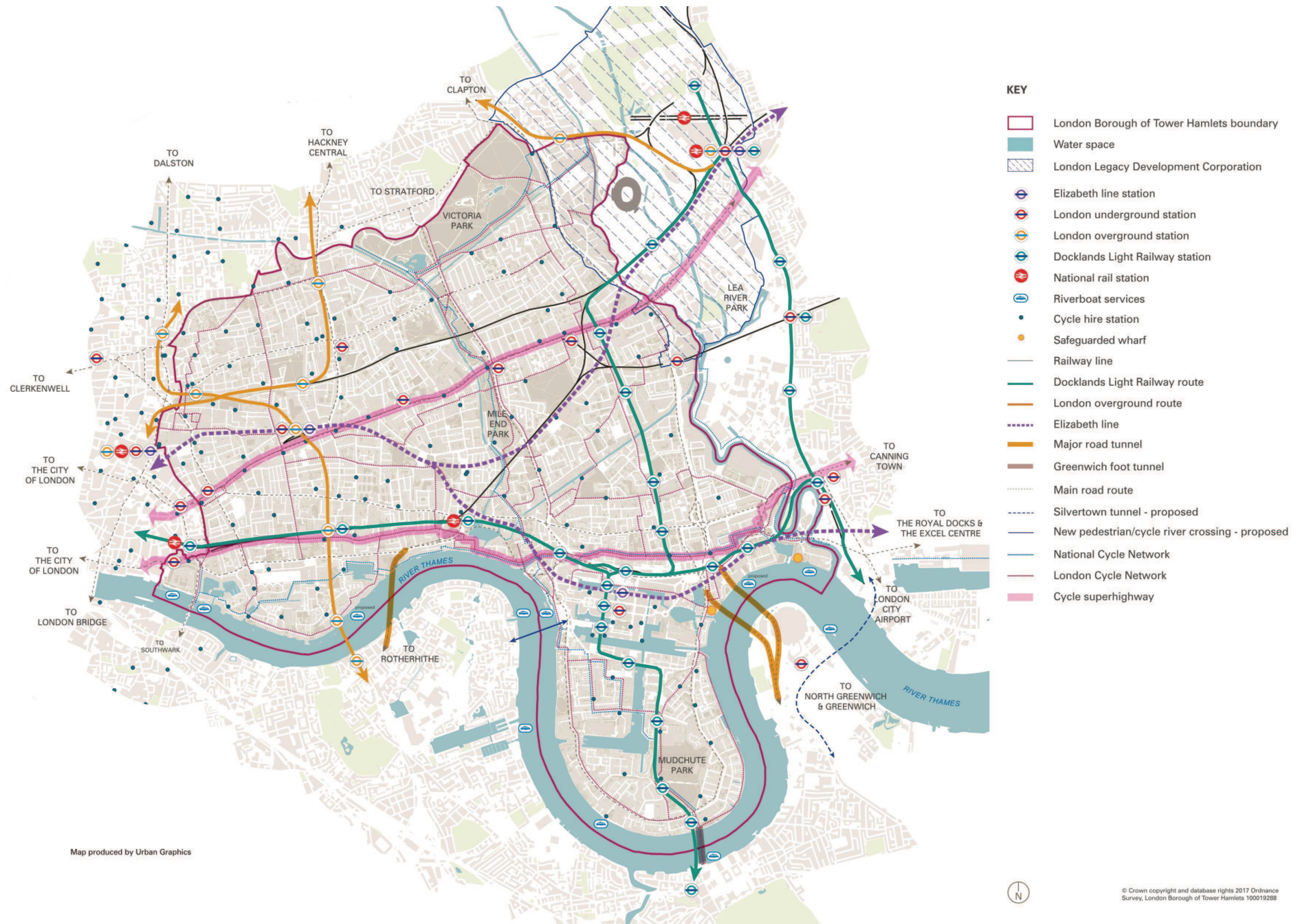
- Policy D.OWS3: Open space and green grid network
- Policy D.ES2: Air quality
- Policy D.ES7: A zero carbon borough

**Evidence links**

- Tower Hamlets Cycling Strategy (2016)
- Mayor of London Transport Strategy
- Tower Hamlets Water Space Study (2017)



Figure 18 Strategic transport connectivity



**Policy D.TR2: Impacts on the transport network**

1. Major development and any development that is likely to have a significant impact on the transport network will be required to submit a transport assessment or transport statement as part of the planning application.
2. Development that will have an adverse impact to traffic congestion on the highway network and/or the operation of public transport (including crowding levels) will be required to contribute and deliver appropriate transport infrastructure and/or effective mitigation measures.

**Explanation**

- 11.16** This policy seeks to address the impact that development has on the transport network, particularly issues of congestion, air quality, severance, safety and/or accessibility for cyclists and pedestrians. In doing so, it sets out how development should accurately and robustly assess the severity of impact it has on existing transport infrastructure and services, including the approach taken to mitigate any adverse impact on capacity, connectivity and congestion.
- 11.17** Current congestion levels in many parts of the borough are severe and the interconnectedness of the highway network - whether local or strategic - plays a significant role in contributing to this congestion. A development's impact on congestion is not just a matter of building size but depends on its location, use, design, density and operational factors (for instance, a relatively small development could be judged to have a severe impact if it generates a high number of trips and/or is in a sensitive location). Given the significant capacity constraints on the public transport and highway network, any development has the potential to create a severe impact on this network within Tower Hamlets.
- 11.18** Part 1 seeks to ensure applications provide an independent, objective and accurate transport assessment or transport statement appropriate to the scale of development. A transport assessment or statement must be prepared in accordance with the most up-to-date guidance from

Transport for London. The level of detail required will be dependent on the type and scale of the development. Applicants/developers should seek pre-application advice to determine whether a transport assessment or statement will be required. A transport assessment should be submitted with a draft construction management and logistics plan and a delivery and servicing plan.

- 11.19** A transport statement is a simpler document than the transport assessment in that it identifies the impact and assesses its significance in conjunction with more modest mitigation measures; thus, it is appropriate for smaller developments. A transport statement may require a construction management and logistics plan or a delivery and servicing plan depending on the type of land use and its location; this should also be established in conjunction with our transport and development management teams at the pre-application stage.
- 11.20** Transport assessments and statements will be required to provide detailed information on the range of transport users and modes, including the movement of people and goods, both before and after a proposed development has been constructed. A transport assessment or statement should set out the measures to avoid, remedy or mitigate impacts from development on all modes of transport.
- 11.21** Applicants/developers should also submit a travel plan alongside the planning application, where appropriate. The scale of development and the level of impact determined by the transport assessment or statement will dictate the type and scope of the travel plan. Transport for London provides guidance that sets out the requirements for each type of travel plan. Such plans must be action-orientated and provide a long term strategy to meet sustainable transport objectives. They should contain a package of measures that will minimise the number of car-borne trips (e.g. restricting car parking provision), encourage use of sustainable transport and reduce the need to travel to and from the development. Travel plans must set targets, objectives and provide detail on implementation, funding and monitoring.
- 11.22** Part 2 seeks to ensure that development does not exacerbate or overload transport networks through trips associated with its uses. Where appropriate, conditions and/or planning contributions will be used (in accordance with policy D.SG5) to secure mitigation measures required

to make a development acceptable in transport terms. The required infrastructure and/or improvement measures should not be in conflict with the Regulation 123 List.

**11.23** Areas in the borough anticipated to accommodate higher levels of population and economic growth such as the Isle of Dogs and City Fringe, are where existing highway and/or public transport demand is already close to or exceeding supply. Other areas of the borough also experience local highway or public transport stress at specific times. Development that increases demand without appropriate mitigation (including infrastructure contributions to service improvements and/or delivering effective modal shift) will not be supported.

### Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG4: Construction of new development
- Policy D.SG5: Developer contributions
- Policy D.ES2: Air quality
- Policy D.ES7: A zero carbon borough
- Policy D.MW2: New and enhanced waste facilities

### Evidence links

- Travel Plan Guidance (Transport for London, 2013)

### Policy D.TR3: Parking and permit-free

1. Development is required to comply with the parking standards for vehicles and bicycles set out in appendix 3.
2. Residential development is required to be permit-free in terms of on-street car parking. All parking associated with a development will be required to be located off-street.
3. Development is required to prioritise sustainable approaches to any parking through ensuring:
  - a. priority is given to space for cycle parking;
  - b. the allocation of car-club spaces;
  - c. there are sufficient electric-charging points;
  - d. any parking spaces are distributed across all tenure types with priority given to family homes and accessible properties; and
  - e. where suitable, publicly-accessible shared cycle hire scheme docking station(s) are provided as part of the development (or through a financial contribution).

### Explanation

**11.24** This policy seeks to ensure that parking is controlled and managed both on-street and off-street to facilitate sustainable travel patterns and address congestion. Minimising car parking provision releases space for other more efficient uses, such as housing, employment, community facilities, play areas, amenity spaces and cycle parking.

**11.25** Demand for on-street parking exceeds capacity, creating a significant amount of stress across the borough's street network. This demand has also increased significantly in recent years as a result of population growth. In addition, the issue of on-street parking outside of controlled hours (usually overnight and at weekends) often overcrowds streets;



results in unacceptable safety and accessibility issues for vulnerable road users; and, in some cases, restricts traffic flows and increases journey times.

- 11.26** Due to excessive on-street parking and land use intensification, the borough does not have the capacity for development to come forward that does not manage its own parking within the curtilage of the site.
- 11.27** However, we recognise that some people, businesses and organisations rely on private vehicle use as their only transport option. If car parking is essential, it must be fully justified in the transport assessment (in line with the parking standards in appendix 3) and provided entirely on-site.
- 11.28** Any development seeking to make alterations to on-street parking and/or loading must be fully justified and will only be permitted where there is proven on-street capacity. Any permitted changes must be fully funded by the developer.
- 11.29** Part 1 directs applicants and developers to the detailed parking standards for vehicles and bicycles in appendix 3. A sufficient amount of cycle parking should be provided to accommodate current demand and to encourage further use over time. Design of cycle parking has been extensively covered in the Transport for London's Cycle Design Standards and developers are required to take account of this when designing cycle facilities.
- 11.30** Parking may be required for those with accessibility or wheelchair needs; and accessible parking bay provision should form a proportion of the overall parking provision (as calculated using the Mayor of London's Housing Supplementary Planning Guidance). In applying the residential parking standards (see appendix 3), applicants/developers should consider any future changes to public transport accessibility levels (PTAL) as a result of new infrastructure provision, particularly in areas of low public transport accessibility (PTAL 1 and 2). Furthermore, where development exceeds the PTAL density range set out in the London Plan, we will apply the parking standards in appendix 3 based on the proposed density rather than the PTAL rating.
- 11.31** Part 2 ensures that all residential development will be permit-free and any parking required must be provided off-street.

- 11.32** Part 3 requires sustainable approaches to parking within new developments, such as car clubs and pool car schemes; this space must be accommodated and designed before any other parking is considered. This will enable exemplary design and ensure the cycle parking provided is fit for purpose. Car clubs are cheaper alternatives to car ownership and will allow for occasional car use but discourage unnecessary car journeys.
- 11.33** Development should also provide parking bays and charging points for electric vehicles, based on the standards and design principles set out in the London Plan. The current standard requires 20% active and 20% passive electrical charging points for electric-vehicle charging.
- 11.34** However, we recognise that residents, particularly those in affordable housing, do not always have the choice over where they live. As such, where development provides car parking, first priority should be given to families (units of three or more bedrooms) and the disabled across all tenures in the development.
- 11.35** A parking management plan that directs the occupiers as to how the parking will be managed, allocated and enforced may be a requirement where development includes vehicle parking.
- 11.36** Around 80% of our residents live in flats, and much of this accommodation has extremely limited cycle parking, cycle storage or docking space. To increase access to cycling in the borough, we are working closely with the Mayor of London and Transport for London to extend the existing cycle hire scheme with new docking stations in appropriate locations. Where appropriate, development will be expected to safeguard land within the site where Transport for London has identified a need to accommodate publicly-accessible shared cycle-hire station(s). Where this is not possible, a contribution will be sought from the developer towards publicly-accessible shared cycle-hire scheme docking station(s) in other locations close to the identified need.
- 11.37** This policy must be read in conjunction with policy D.TR4 (see below) and appendix 3 to ensure that along with on-site parking provision, development provides adequate delivery and servicing facilities within the site as well as encouraging shared servicing arrangements and timing of deliveries.

## Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG5: Developer contributions
- Policy D.H3: Housing standards and quality
- Policy D.ES2: Air quality
- Policy D.ES7: A zero carbon borough

## Evidence links

- Housing Supplementary Planning Guidance (GLA, 2016)
- London Cycling Design Standards (Transport for London, 2015)

## 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:
  - a. impact to the transport network and amenity will be avoided, remedied or mitigated through transport assessments, construction management and logistic plans and delivery and servicing plans;
  - 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;
  - c. movement by water and/or rail; and the use of low emission vehicles, electric vehicles, bicycles and freight consolidation facilities have been prioritised; and
  - d. deliveries to sites will be reduced through suitable accommodation and management.
2. Development adjacent to safeguarded wharves and rail depots is required to ensure it does not compromise their operation.
3. Development of new wharves or other facilities for freight transfer between road, rail or water will be supported where these minimise impacts on the environment and neighbouring amenities.

## Explanation

**11.38** Deliveries and servicing are essential to the economic growth of the borough. By 2025, the continued growth of London is expected to result in a 15% increase in demand for freight and servicing<sup>(80)</sup>. These trips will add to traffic congestion and, if they are not managed and contained off the highway, will lead to blocking of both local and strategic roads whilst loading/unloading of goods takes place. This will significantly increase journey times, particularly for buses.

**11.39** Freight vehicles are typically some of the most polluting vehicles on our roads. Furthermore, the projected growth in the borough will lead to increased construction traffic and associated vehicles which tend to bring more pollution, noise and dust.

**11.40** This policy seeks to address the challenges the borough faces in ensuring the efficient, safe, timely and sustainable movement of goods and materials across the borough, whilst seeking to improve air quality and reduce impacts arising from the freight network such as accidents, spillages or wastes.

**11.41** As the proportion of cyclists and pedestrians has grown, pedestrian and cycle safety has become an area of increasing concern in Tower Hamlets, particularly given the rise in fatalities on busy arterial roads. Across London, nearly two thirds of cyclist deaths and around a quarter of pedestrian deaths involve a heavy goods vehicle<sup>(81)</sup>. This policy seeks to reduce the impact of delivery, servicing and construction traffic on the environment and the health and well-being of residents in terms of noise disturbance and its contribution to road congestion and air pollution.

**11.42** Part 1 ensures that development generating a significant number of vehicle trips for goods or materials will be assessed in relation to its likely impact on the transport network and with reference to the most up-to-date Transport for London guidance relating to deliveries, servicing and construction logistics. In particular, development will need to plan and manage its freight movements through the construction and operational phases of the development, based on the wide range of existing guidance from Transport for London.

**11.43** In addition, development will need to provide sufficient space for deliveries and servicing within the site curtilage and off the public highway (including refuse collection). If this is not practical then on-street provision may be considered so long as it:

- can be clearly demonstrated and adequately justified;
- does not restrict traffic flows; or
- does not compromise the safety of other roads users.

**11.44** Development must seek to prioritise sustainable methods in the movement of goods and services, particularly sites with significantly greater delivery and servicing frequencies and sizes. Construction can make significant environmental and cost savings through more sustainable methods of recycling existing materials; this can significantly reduce freight movements by vehicles such as tipper trucks which tend to be more polluting and more hazardous to cyclists compared to other vehicles.

**11.45** Part 1 (d) requires development to minimise the amount of deliveries it receives; this may be achieved through a number of measures in the Mayor of London's Transport Strategy and Transport for London's supporting documents. Residential development will require bespoke management and delivery accommodation when compared to commercial development. The rapid acceleration of internet shopping has resulted in a significant growth of smaller light goods vehicles, which increase congestion and pollution at peak times as well as traditionally quieter times. Delivery vehicles to residential addresses often park on the highway causing traffic flow and safety concerns. This disruption increases with missed deliveries whereby the same address receives a second or third delivery attempt. Development should provide space for these deliveries and help ensure all such deliveries are completed on the first attempt.

**11.46** The borough's river and rail network represents an underused resource and priority should be given to utilising the rivers and canals to facilitate the movement of waste and goods, particularly the safeguarded wharves such as Northumberland Wharf and Orchard Wharf (see parts 2 and 3). The policy also requires adjacent development to recognise the role of wharves and depots and must not negatively impact their functions.

81 New measures to rid London of dangerous lorries (Transport for London, September 2016).

## Policy links

- Policy S.SG2: Delivering sustainable growth in Tower Hamlets
- Policy D.SG4: Construction of new development
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy S.EMP1: Creating investment and jobs
- Policy D.ES2: Air quality
- Policy D.ES7: A zero carbon borough
- Policy S.MW1: Managing our waste
- Policy D.MW2: New and enhanced waste facilities

## Evidence links

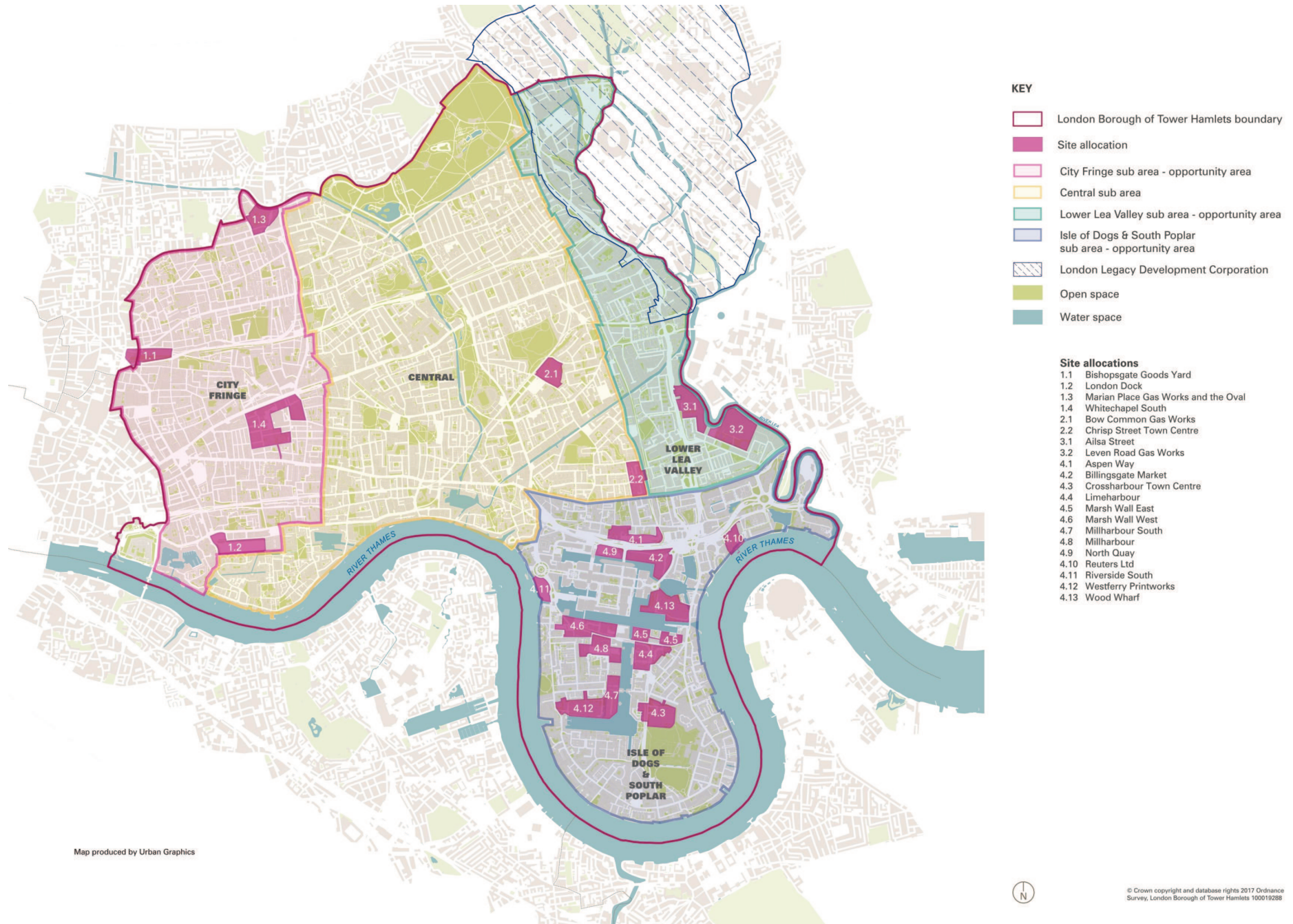
- Mayor of London's Transport Strategy (GLA, 2017)
- London Cycling Design Standards (Transport for London, 2015)
- Delivery and Servicing Plan Guidance (Transport for London)
- Construction Logistics Plans Guidance (Transport for London, 2017)

## Chapter 1: Introduction

- 1.1** Delivering sustainable places is an important aspect of spatial planning to address the needs and priorities of the borough and deliver long term benefits to people and communities across the borough and beyond. Successful place-making is critical to creating cohesive, well-connected and more vibrant communities and ensuring that development responds positively to the distinct and unique characteristics which make Tower Hamlets a great place to live, work and visit.
- 1.2** Policy S.SG1 (Areas of growth and opportunity within Tower Hamlets) sets out the overall strategy of how and where growth will be distributed across the borough. This section provides more detail on how different areas of the borough will accommodate this growth in line with the principles of sustainable development.
- 1.3** In order to realise the vision and objectives of the Local Plan, the following sub-areas have been identified to positively manage development opportunities and change in the borough at the strategic level.
1. City Fringe
  2. Central
  3. Lower Lea Valley
  4. Isle of Dogs and South Poplar
- 1.4** This section sets out how each sub-area will grow and change over the period to 2031. In particular, it sets out the vision, objectives and overarching principles which will inform and guide development proposals within each sub-area, taking account of the character and identity of the borough's 24 places (see figure 4).
- 1.5** Within each sub-area, a number of sites (known as allocations) have been identified to accommodate new homes and jobs alongside necessary infrastructure, such as open space, health and education facilities.
- 1.6** All of the sub-areas and site allocations are shown in figure 19. This section also contains maps illustrating each sub-area and the site allocations within them. These maps are indicative and illustrate how the principles and requirements set out in this section should be implemented.
- 1.7** Development within these sub-areas will also need to take account of other relevant guidance and supporting information such as supplementary planning guidance/supplementary planning documents, masterplans and opportunity area planning frameworks (as outlined overleaf).
- 1.8** Neighbourhood plans may also shape the future planning of these areas at a neighbourhood level and developers and other relevant parties will need to consult with neighbourhood forums to inform development proposals in the neighbourhood planning areas.



Figure 19 :Sub-areas and site allocations



## Chapter 2: Sub-area 1: City Fringe

### Location

**2.1** The City Fringe sub-area is located in the western part of the borough, bounded by the City of London’s financial district to the west, the London borough of Hackney to the north, the River Thames to the south, and the borough’s inner city communities to the east. The sub-area also corresponds with the borough’s portion of the London Plan’s City Fringe opportunity area. The wider opportunity area also includes parts of the London boroughs of Hackney and Islington.

Figure 20 :Character places in City Fringe



**2.2** The City Fringe represents a collection of vibrant and distinctive town centres and employment hubs, which sit alongside residential areas. It comprises eight distinct character places. The Tower Hamlets Urban Structure and Characterisation Study provides more information on the key elements of the local character of each of these places.

### Vision for City Fringe

By 2031, the City Fringe will become a more attractive place to live, work and visit. New communities will be well integrated into the area, benefiting from the close proximity to existing and new employment, retail and leisure uses within the wider area.

The world-class economic hub of the City of London will expand and opportunities arising from the Tech City and Med City initiatives will be maximised. Whitechapel, Cambridge Heath, Shoreditch, Spitalfields and Aldgate will all have a more diverse mix of commercial, cultural, leisure, tourism and night-time activities. It will be a place for new affordable and flexible employment spaces benefiting from the arrival of the Elizabeth line and improved accessibility to the local area. Whitechapel and the surrounding area will benefit from a new state-of-the-art research and education facilities and will accommodate start-ups and other supporting businesses.

A new civic centre and a new green spine to the south of Whitechapel Road will provide focal points for leisure and community/social activities. The public realm in and around the Tower of London world heritage site will be enhanced, with improved legibility and movement for all users.

**2.3** To achieve this vision, our objectives are to:

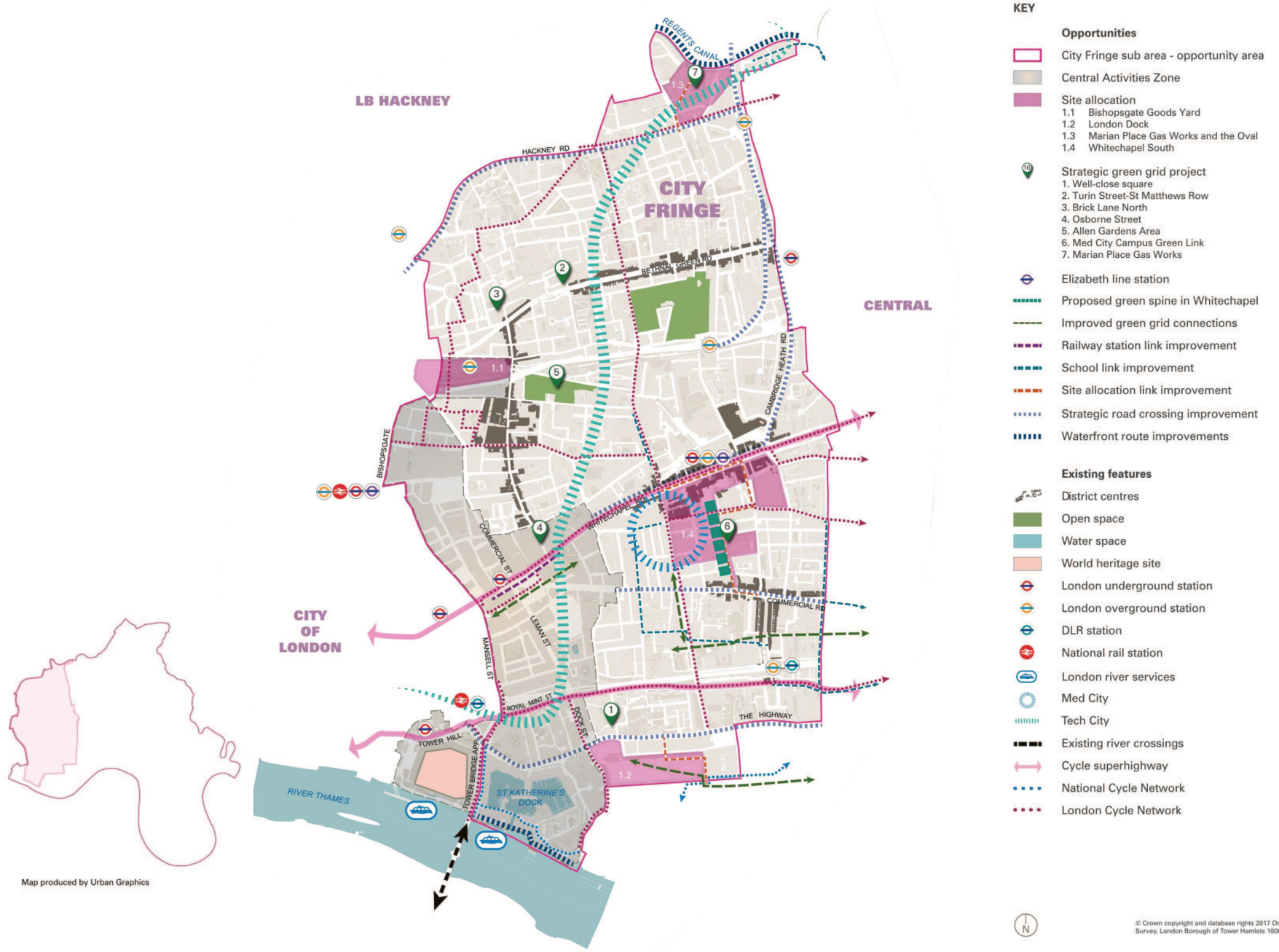
- create a new civic centre and world-class life science research hub at Whitechapel;
- protect and enhance the area’s heritage assets and improve the historic character of the individual places;
- support a mix of uses to support the financial and business centres of the City of London, Tech City and the emerging research and life sciences cluster (Med City), whilst striking the appropriate balance between residential and commercial development;
- improve and enhance legibility, permeability and connectivity within, to and from the area, whilst enhancing and improving green grid links;

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- strengthen the role and function of the area's distinctive and varied town centres to provide a choice of cultural, leisure and retail activities; and
- create new open spaces (including pocket parks and strategic open space) and improve links to existing publicly accessible open space.



Figure 21 :Vision for City Fringe

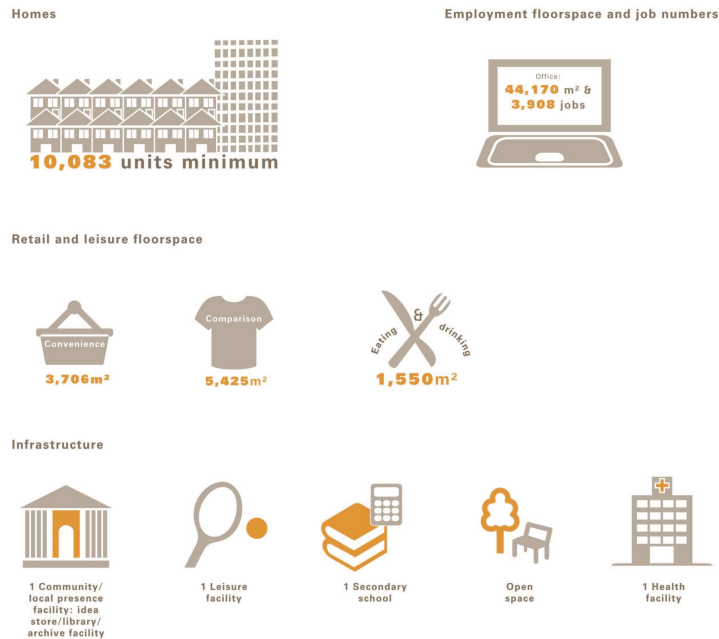


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## Development potential

**2.4** By 2031, development within the City Fringe will be required to accommodate the following uses to meet the future needs of the borough<sup>(82)</sup>.



## Delivering sustainable places: City Fringe sub-area development principles

**2.5** In line with policy S.SG1, all development in the City Fringe sub-area will seek to deliver the following principles.

### Creating distinctive places

1. Enhance positive elements of existing buildings, streetscape and the wider context, including surrounding heritage assets, views and character.

2. Preserve or enhance the fine urban grain and traditional street pattern and respect the integrity, rhythm and visual amenity of the street scene that characterises the area
3. Improve the public realm and the settings around heritage assets, and sensitively refurbish and reinstate the use of historical buildings and spaces, including The Oval as a London square and the former Royal London Hospital.
4. Deliver high quality public realm and improved permeability (north-south links in particular) around the new civic centre and research hub at Whitechapel to foster a renewed sense of place.
5. Improve the public realm, including signage and way-finding in and around the Tower of London to encourage visitors to explore the rest of Tower Hamlets.

### Meeting housing needs

6. Provide a range of housing typologies to create sustainable places to live, work and play.
7. Maximise provision and deliver a creative approach to onsite communal and private amenity space, including child play space for all ages.

### Delivering economic growth

8. Provide employment uses across the area that contribute towards the Tech City and Med City initiatives (in accordance with the Whitechapel Vision Supplementary Planning Guidance and City Fringe Opportunity Area Planning Framework and any equivalent replacement document), including a range of flexible workspaces for small-to-medium enterprises and significant floorspace around the secondary preferred office locations.
9. Integrate the emerging life science campus with the new civic centre at Whitechapel, with well-arranged and designed public spaces and retail uses that protect or enhance the area's historic character.

### Revitalising our town centres

10. Capitalise on the visitor economy arising from the Tower of London to support retail and night time activities in surrounding town centres.

<sup>82</sup> Capacity figures derive from the housing trajectory (see appendix 7) and the Employment Land Review and Town Centre Retail Capacity Study (both published in 2016). The job and floorspace targets are based on Greater London Authority and Experian figures. The latter study assessed the existing centres of Bethnal Green, Brick Lane, Watney Market and Whitechapel.

11. Promote a mix of uses that successfully reinforce the City Fringe character of small independent shops and businesses, alongside residential use.
12. Contribute to the vitality and resilience of town centres, including reinforcing and complementing the distinctiveness and mix of uses in Watney Market, Whitechapel, Brick Lane and Bethnal Green town centres.

**Protecting and managing our environment**

13. Support the provision of innovative waste management and recycling storage and collection systems.
14. Support the expansion of the borough’s energy network by exploring the potential of creating a district heating facility in the areas: Aldgate, Whitechapel, Bethnal Green and Wapping.
15. Improve the ecology of the area and ensure an overall net gain in biodiversity.
16. Improving air quality and reducing exposure to poor air quality

**Enhancing open spaces and water spaces**

17. Deliver a network of new or improved connected open spaces and encourage the greening of the public realm, including Swedenborg Gardens and a linear open space from Commercial Road up along Philpot Street to the new civic square.
18. Provide new or improved walking routes along the waterways, including St Katherines Dock and Regents Canal.
19. Expand the green grid network through green interventions such as planting, greening facades, trees and incorporation of planters, where appropriate, to improve north-south pedestrian permeability, particularly at Turin Street/St. Matthews Row and Rhoda Street/Bethnal Green Road and Brick Lane/Whitechapel High Street and the Allen gardens area.

**Improving connectivity and travel choice**

20. Contribute to / deliver new and improved high quality legible routes and public realm to reinforce north-south and east-west connectivity and accessibility in the area.

21. Address severance on Whitechapel Road, Commercial Road and The Highway to encourage short distance trips to be made by foot or cycle through way-finding and convenient crossing facilities.
22. Improve public realm along main strategic connections and links, particularly between Watney Market and the Highway, Tower of London and Aldgate, Aldgate and Whitechapel, and Whitechapel and Bethnal Green.

**Relevant links**

2.6 A number of planning policy documents are particularly relevant to this area and should be considered alongside the guidance in this section. These include the following.

Greater London Authority	London Borough of Tower Hamlets
<ul style="list-style-type: none"> <li>• City Fringe Opportunity Area Planning Framework (2015)</li> <li>• Central Activity Zone Supplementary Planning Guidance (2016)</li> </ul>	<ul style="list-style-type: none"> <li>• Whitechapel Vision Supplementary Planning Document (2013)</li> </ul>

**Site allocations**

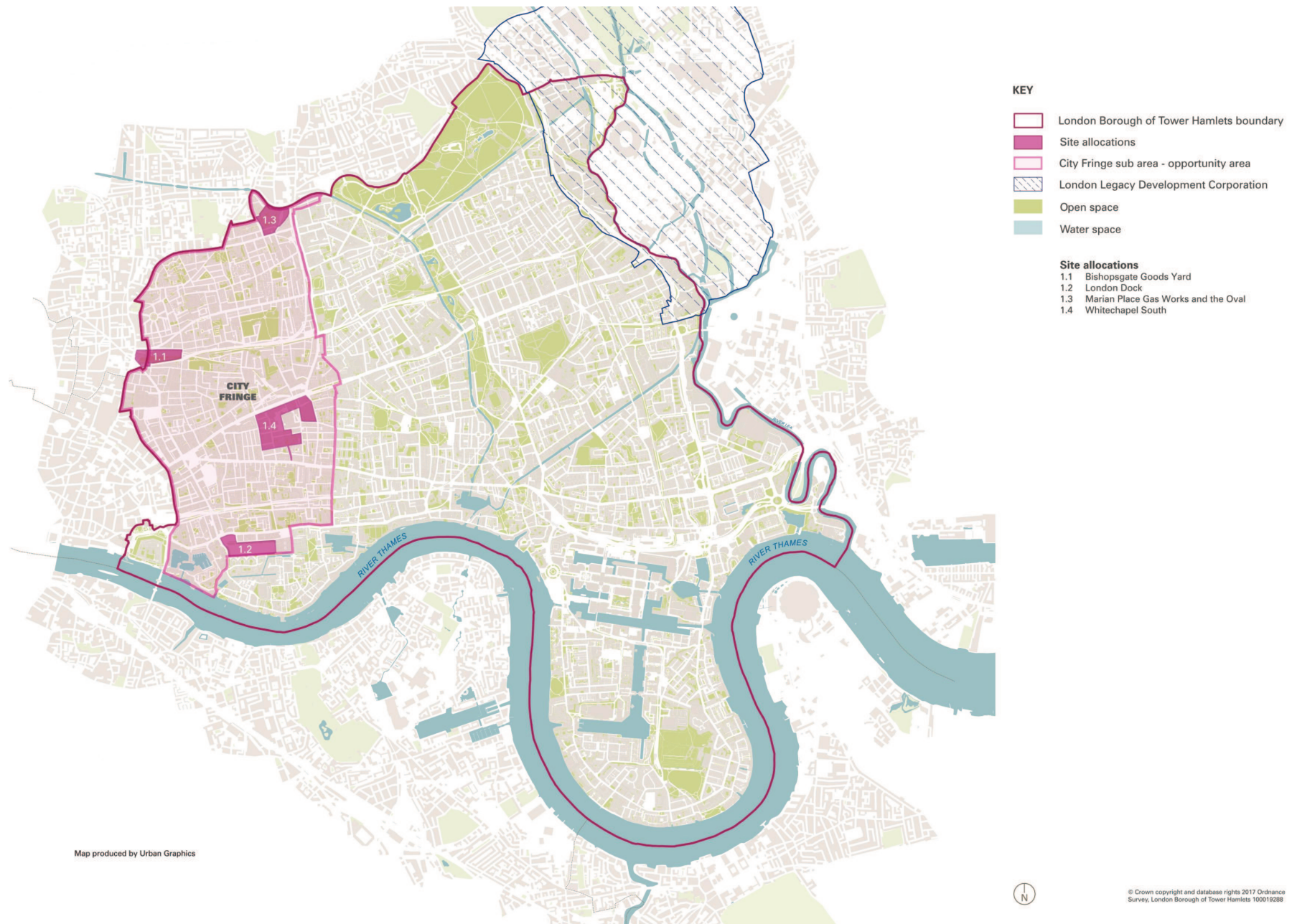
2.7 The site allocations for the City Fringe sub-area are:

- 1.1: Bishopsgate Goods Yard;
- 1.2: London Dock;
- 1.3: Marian Place Gas Works and the Oval; and
- 1.4: Whitechapel South

2.8 In total, the site allocations will potentially deliver at least 3,790 new homes. The land use, infrastructure and design requirements relating to each site allocation are set out in the following profiles.



Figure 22 :City Fringe site allocations



**Bishopsgate Goods Yard**

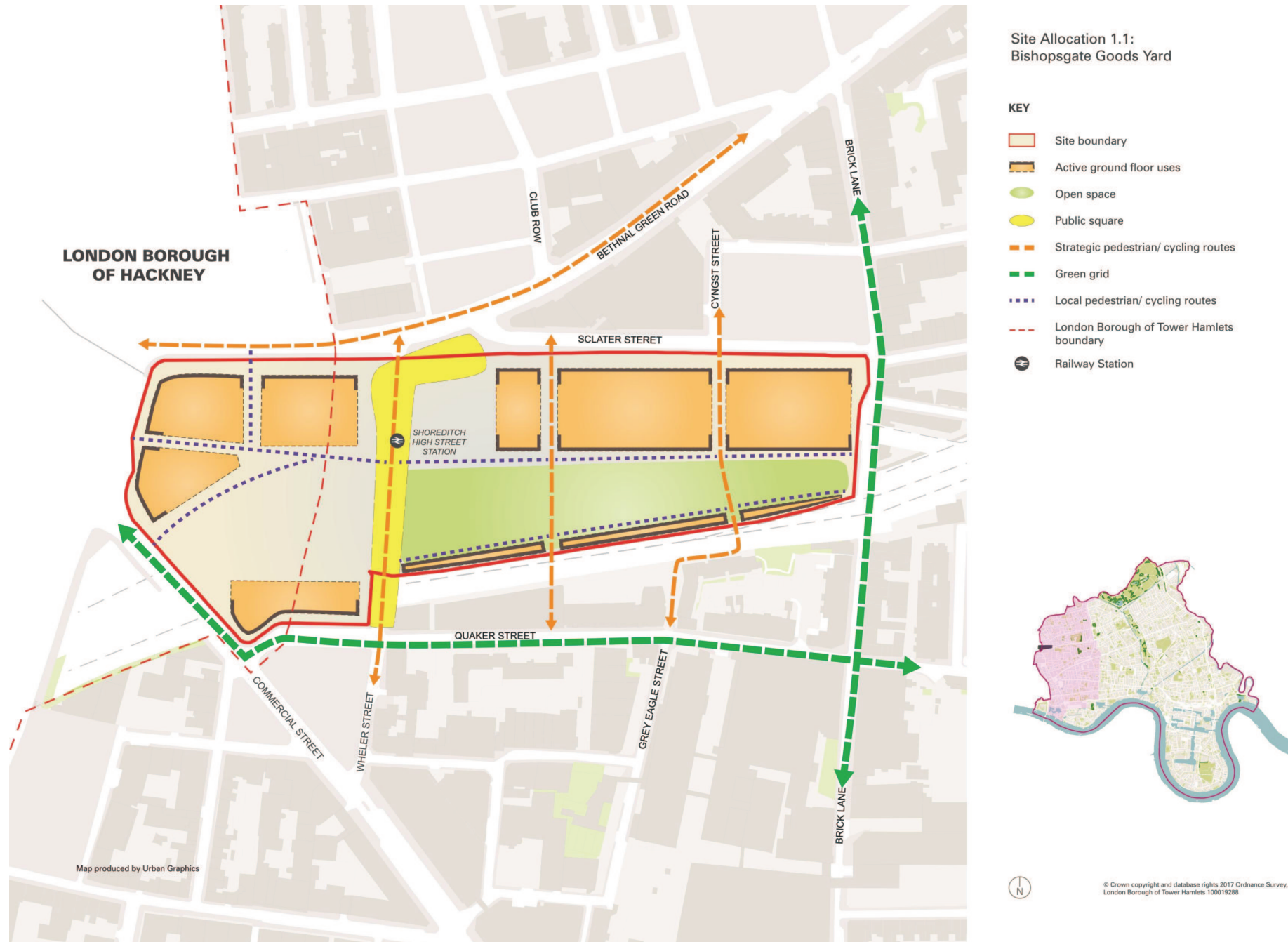
<b>Address</b>	Shoreditch High Street	
<b>Size (hectares)</b>	4.24	
<b>Public transport accessibility levels</b>	6a-6b (2017)	6a-6b (by 2031)
<b>Flood zone</b>	1	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: a range of floorspace sizes, including small-to-medium enterprises</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Strategic open space (1 hectare)</li> <li>• Community/local presence facility</li> <li>• Leisure centre</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing scale, height, massing and fine urban grain of the surrounding built environment;</li> <li>• protect or enhance heritage assets on site including the existing grade II-listed Braithwaite viaduct, and sensitively consider its impacts on the conservation areas, strategic and local views. Development should also protect or enhance heritage assets in the surrounding areas (including within the London Borough of Hackney);</li> <li>• focus larger-scale buildings around Shoreditch High Street Overground station;</li> <li>• integrate development with the surrounding area and improve the street frontage and public realm on key routes, particularly along Wheler Street and ensure it is well integrated into public squares to the east and south of the station;</li> <li>• maximise the provision of family homes;</li> <li>• improve walking and cycling routes to, from and within the site to establish connections to Shoreditch High Street Overground station, Brick Lane district town centre and the new open space. These should align with the existing urban grain to support permeability and legibility;</li> <li>• provide open space with a minimum size of 1 hectare, consolidated and integrated with the green grid along Quaker Street and Brick Lane in the form of a multi-functional local park located above the Braithwaite Viaduct;</li> <li>• improve biodiversity and ecology within open space and green infrastructure; and</li> <li>• improve movement through the area and repair fragmented urban form (e.g. locate a community/local presence facility on key routes).</li> </ul>	

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## Delivery considerations

- Community infrastructure requirements should be delivered in the early stage of the development to ensure the provision of new homes and jobs are supported by infrastructure.
- The community/local presence facility should be delivered within or adjacent to the Brick Lane district centre.
- Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.
- Development should carry out meaningful consultation with a wide range of residents and local organisations.

Figure 23 :Bishopsgate Goods Yard



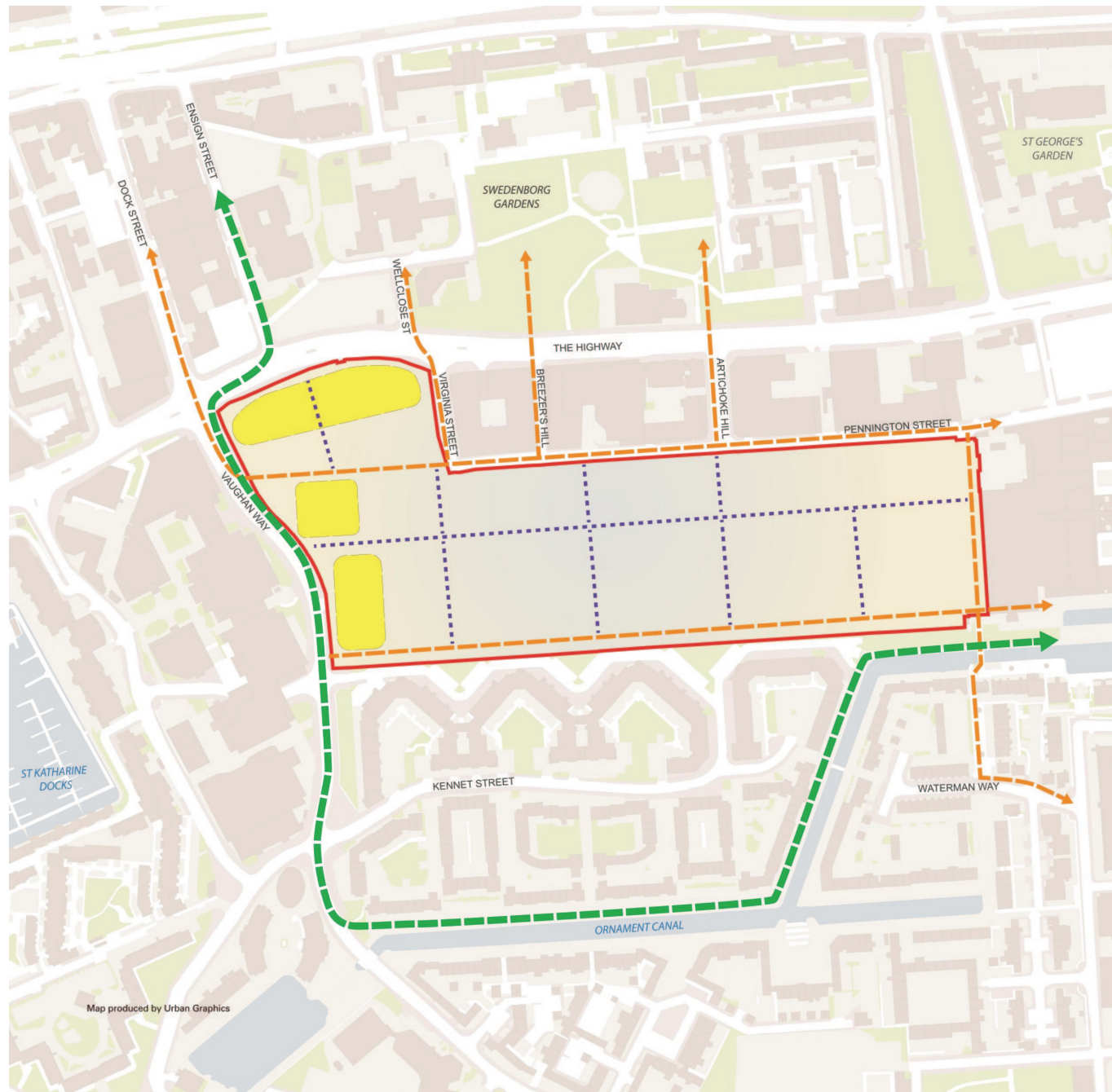


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## London Dock

<b>Address</b>	Pennington Street	
<b>Size (ha)</b>	5.78	
<b>Public transport accessibility levels</b>	2 -3 (2017)	2-4 (by 2031)
<b>Floodzone</b>	1-3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: a range of floorspace sizes, including small and medium enterprises</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> <li>• Secondary school</li> <li>• Health facility</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, specifically to the north, south and east;</li> <li>• protect or enhance heritage assets on site and in the surrounding areas, including the grade I listed Tobacco Dock;</li> <li>• provide open space which is consolidated and integrated with the green grid route along Vaughan Way, The Highway and adjacent to the site along the canal;</li> <li>• provide green grid connections along Wapping Lane and Pennington Street to connect to Swedenborg Gardens to the north.</li> <li>• improve walking and cycling connections to, from and within the site, specifically to address permeability through the site. These should align with the existing urban grain to support permeability and access to Thomas More neighbourhood centre, St Katharine Docks, Tobacco Dock and the Wapping Canal; and</li> <li>• improve the public realm at active site edges, specifically along The Highway and Vaughan Way.</li> </ul>	
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>• Safe access route(s) to the secondary school are required, and development will need to deliver improved pedestrian and cycling routes.</li> <li>• Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.</li> </ul>	

Figure 24 :London Dock



Site Allocation 1.2:  
London Dock

KEY

-  Site boundary
-  Public square
-  Strategic pedestrian/ cycling routes
-  Green grid
-  Local pedestrian/ cycling routes



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## Marian Place Gas Works and The Oval

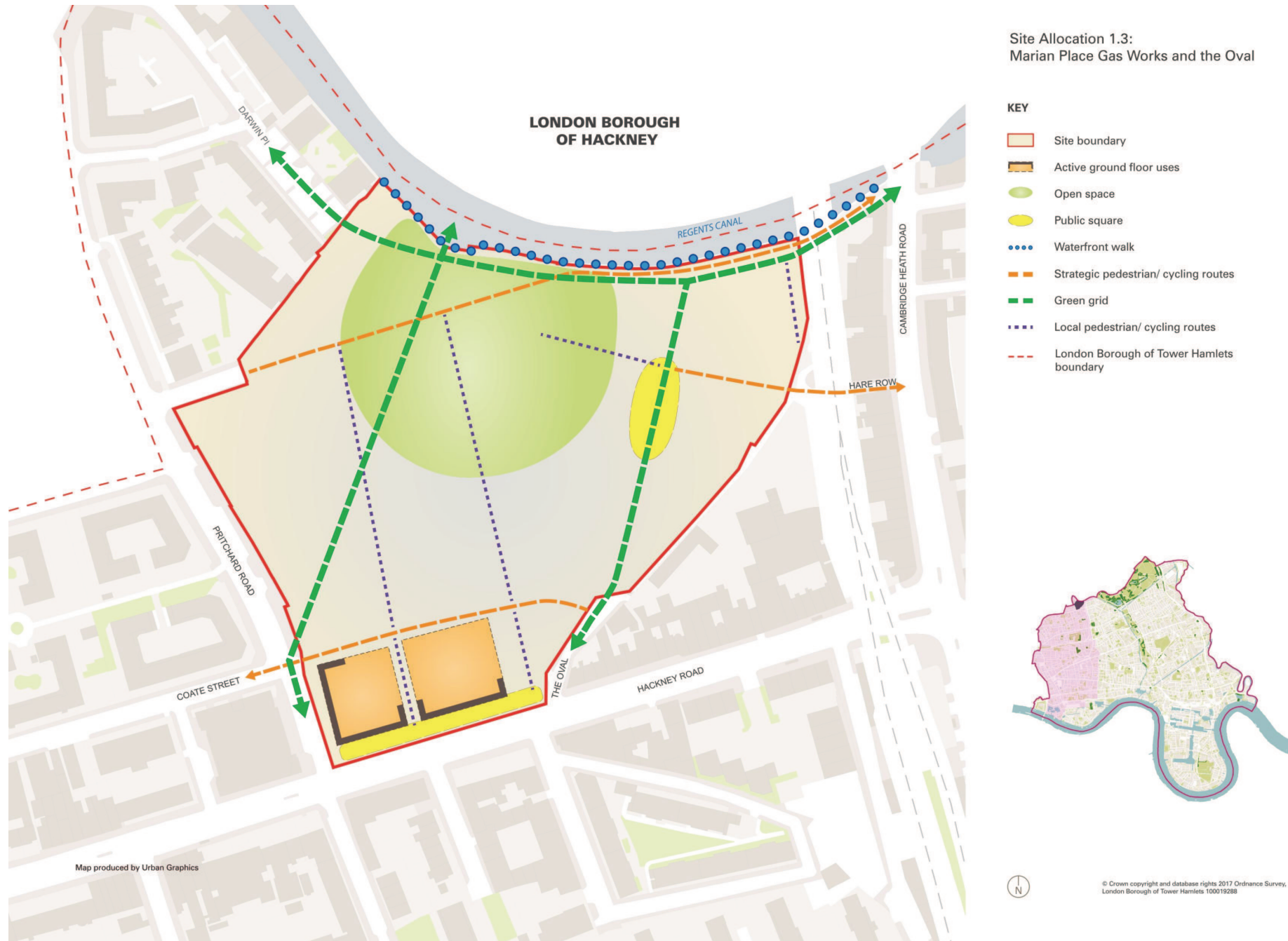
<b>Address</b>	Marian Place / The Oval / Emma Street	
<b>Size (hectares)</b>	3.75	
<b>Public transport accessibility levels</b>	4-6a (2017)	4-6a (by 2031)
<b>Floodzone</b>	1	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: a range of floorspace sizes, including suitable units for the needs of small-medium enterprises, start-ups and creative and tech industries</li> <li>• Other: Compatible community and social uses, including nurseries</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Strategic open space (1 hectare)</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, and specifically integrate heritage assets on site and in the surrounding areas;</li> <li>• retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures, Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated pebbled street and railings;</li> <li>• re-use The Oval as new public open space which positively contributes to the surrounding buildings and well-connected to the new open space. The Oval should be fronted by a continuous building line following its footprint;</li> <li>• provide active frontage set back from the canal, and positively frame the open space and The Oval to avoid excessive overshadowing;</li> <li>• improve walking and cycling connections to, from and within the site: these should align with the existing urban grain to support permeability and link with Cambridge Heath neighbourhood centre;</li> <li>• maximise the provision of family homes;</li> <li>• improve biodiversity and ecology within open spaces and green infrastructure;</li> <li>• provide a minimum size of 1 hectare of consolidated open space which is designed to be usable for sport and recreation;</li> <li>• integrate the development into the green grid network through new and improved access routes to the canal, the open space and The Oval, together with greening the public realm; and</li> <li>• improve the public realm with active site edges, specifically along Hackney Road, Pritchard's Road, Emma Street and The Oval. In addition, generous pavement and a linear landscaped square should be provided along Hackney Road in order to mitigate the impacts of the heavy through traffic on the narrow street.</li> </ul>	

<b>Delivery considerations</b>	<ul style="list-style-type: none"><li>• Family housing should be delivered in close proximity to the open space to increase recreational opportunities, access to and enjoyment of open space.</li><li>• Development should address any environmental pollution and land contamination caused by the gas works.</li><li>• Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.</li><li>• Development should accord with any flood mitigation and adaptation measures stated within the borough’s Strategic Flood Risk Assessment and the sequential test.</li></ul>
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Figure 25 :Marian Place Gas Works and The Oval



**Whitechapel South**

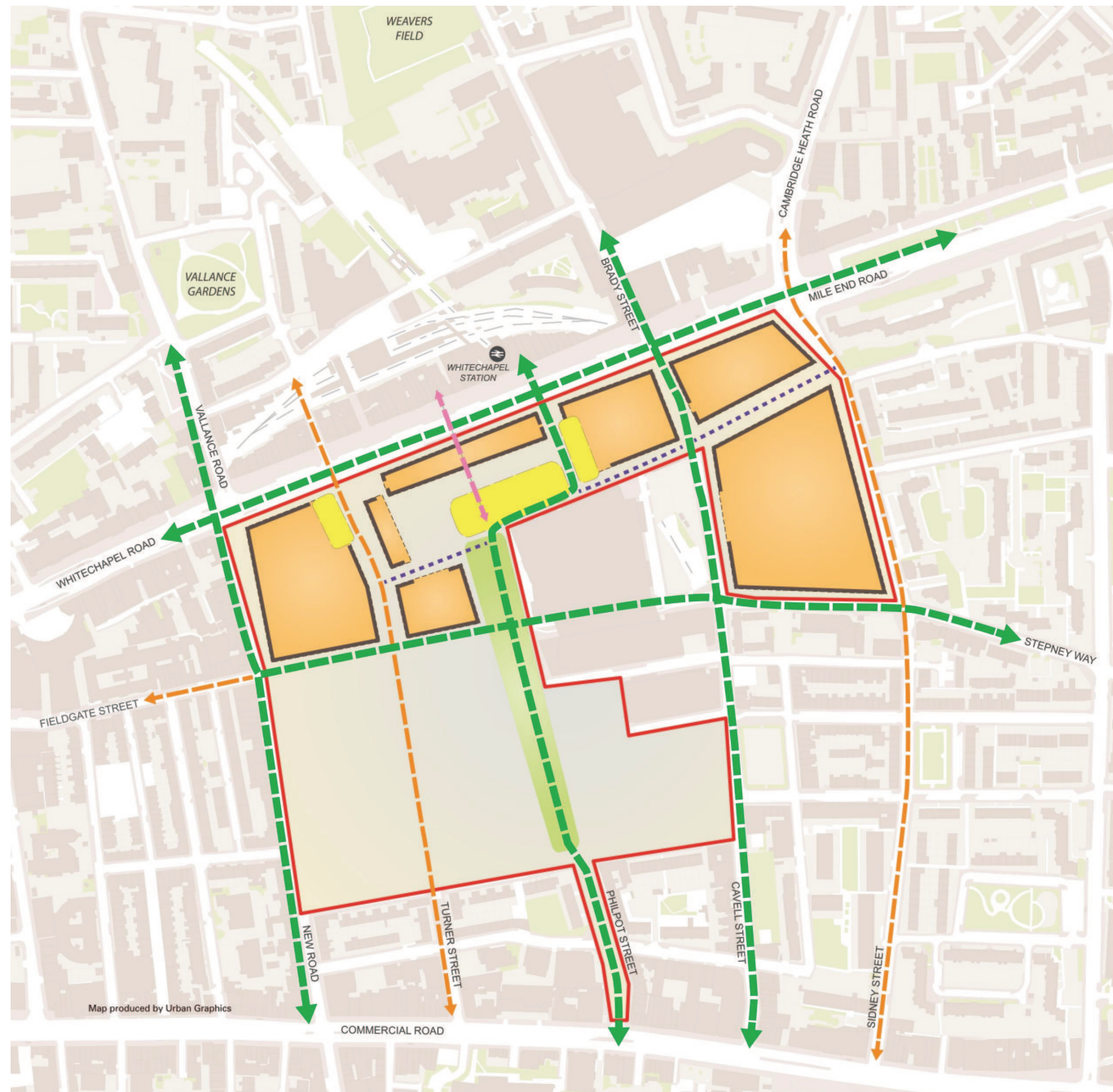
<b>Address</b>	Whitechapel Road	
<b>Size (hectares)</b>	9.5	
<b>Public transport accessibility levels</b>	6a (2017)	6b (by 2031)
<b>Floodzone</b>	1	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Employment-led (within the Local Employment Location) providing suitable units for the needs of life science, medical and research uses.</li> <li>• Housing</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Strategic open space (1 hectare)</li> <li>• Health centre</li> <li>• District heating facility</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the heritage assets and existing character, scale, height, massing and fine urban grain of the surrounding built environment;</li> <li>• restore and/or enhance connections between neighbouring strategic sites, particularly north of Whitechapel Road and ensure the streetscape and the wider context, including design and character are addressed;</li> <li>• create a sense of place set around a public square behind the former Royal London Hospital building and new public square immediately to the east of St. Augustine with St. Philip's Church to positively integrate the life sciences and research hub with the new civic centre and the green spine;</li> <li>• maximise the provision of family homes;</li> <li>• walking and cycling routes should be supported through the green linear open space, but should not jeopardise its role and function as a green open space;</li> <li>• create a sense of place and increase recreational opportunities, access to and enjoyment of the open space to promote healthy living.</li> <li>• repair the fragmented urban form to create a legible, permeable and well-defined movement network; and</li> <li>• facilitate the delivery of consolidated interconnected open spaces which link Whitechapel town centre to Commercial Road through the following.             <ol style="list-style-type: none"> <li>a. Provision of new and improved open space should stretch from Philpot Street to the new civic centre. It should be linear in nature and provide a direct visual link across its length.</li> </ol> </li> </ul>	

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	<ul style="list-style-type: none"><li>b. Buildings in alignment with the green linear open space should make a positive contribution to reinforce north-south legibility with permeable routes and visual links through the new development.</li><li>c. Existing consented open space which has yet to be implemented on site is an integral element to the provision of 1 hectare of strategic open space should be re-provided. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new green linear open space (known as the green spine) to maximise its multi-functional use.</li></ul>
<b>Delivery considerations</b>	<ul style="list-style-type: none"><li>• Development should accord with the design principles set out in the latest supplementary guidance for Whitechapel.</li><li>• Delivery of a health facility should be a NHS-funded primary care and re-provide the existing sexual health facility.</li><li>• Development should ensure the comprehensive and coordinated delivery of the new high quality linear open space is delivered in a consistent design across the area.</li><li>• As the site is greater than a hectare in size, a site-specific flood risk assessment will be required to assess all sources of flood risk.</li></ul>



Figure 26 :Whitechapel South



Site Allocation 1.4:  
Whitechapel South

KEY

- Site boundary
- Active ground floor uses
- Open space
- Public square
- Strategic pedestrian/ cycling routes
- Green grid
- Visual Link
- Local pedestrian/ cycling routes
- Railway Station



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## Chapter 3: Sub-area 2: Central

### Location

- 3.1** The Central sub-area sits in the heart of the borough, bounded by London borough of Hackney to the north, the London Legacy Development Corporation and the Lower Lee Valley sub-area to the east, the Isle of Dogs and South Poplar sub-area to the south, and the City Fringe sub-area to the west. The sub-area is not a designated opportunity area, but has the capacity to deliver new development.
- 3.2** The sub-area is a collection of vibrant and distinctive town centres, transport interchanges and residential areas. The sub-area comprises parts of nine distinct character places (see figure 27). The Tower Hamlets Urban Structure and Characterisation Study provides further information on the key elements of the local character of each place.

Figure 27 :Character places in Central



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### Vision for Central

By 2031, the distinct character and identity of the Central sub-area will have been enhanced and strengthened. Growth will be focused around vibrant and revitalised town centres and neighbourhood parades, including Roman Road and Mile End town centres. New development will complement the well-established streetscape and character and the area's many heritage assets, and their settings will be preserved or enhanced through opportunities for new heritage-led development.

Access to and the quality of the area's green open spaces (including Victoria Park and Mile End Park) and network of waterspaces (including Regents Canal and Limehouse Cut) will be enhanced and opportunities for new green links and open spaces will be maximised. New development will reduce the severance resulting from The Highway, Mile End Road and Commercial Road, the waterways and railway lines, and provide public realm improvements. Improved cycling and walking routes will increase local accessibility and access to strategic cycle routes and transport interchanges.

Employment in the area will remain primarily local and small-scale focused in town centres and transport hubs, including Bethnal Green, Mile End and Limehouse. Industrial locations along The Highway and Limehouse Cut will further complement existing employment opportunities and will accommodate an increasing number of flexible workspaces suited to new growth industries, including creative and digital industries.

Queen Mary University of London's role as a knowledge hub will be strengthened, with stronger connections to Mile End town centre and its public transport interchange. The area will be home to a more diverse range of residential and student communities, with a particular focus on family housing which will benefit from access to varied open spaces.

### 3.3 To achieve this vision, our objectives are to:

- ensure the strategic north-south spine of Victoria Park and Mile End Park is protected and enhanced with walking and cycling links,

whilst maximising opportunities to access the waterways for recreational use;

- support a mix of uses in town centres to facilitate community cohesion and strengthen their role, including employment, retail, civic, cultural and leisure uses;
- overcome the physical barriers of the road, rail and waterway network to increase connectivity within the area, improve permeability between transport nodes and town centres to strengthen interconnected places;
- encourage the regeneration of key historic buildings to preserve the areas diverse heritage assets and character;
- deliver a range of housing choice from student accommodation, family housing, infill development and intensification where it contributes to delivering mixed and balanced communities, and;
- support the expansion of Queen Mary University of London and associated uses, while ensuring good integration with surrounding areas.

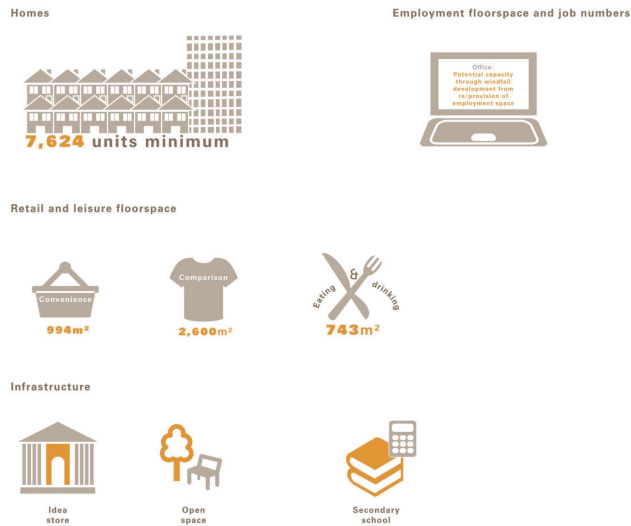


Figure 28 :Vision for Central



## Development potential

**3.4** By 2031, development within the Central sub-area will be required to accommodate the following uses to meet the future needs of the borough<sup>(83)</sup>.



## Delivering sustainable places: Central sub-area development principles

**3.5** In line with policy S.SG1, all development in the Central sub-area will seek to deliver the following:

### Creating attractive and distinctive places

1. Create a scale and form of development that provides a consistent and coherent setting for the area it defines and relate to the prevailing townscape.
2. Respond positively to the surrounding context including conservation areas and heritage assets which define the local character.

### Meeting housing needs

3. Provide a range of housing typologies whilst maximising the provision of family housing which can benefit from access to the areas open and water spaces.

### Delivering economic growth

4. Provide small-to-medium enterprises and a range of flexible and affordable workspace opportunities (including supporting facilities such as childcare provision) in and around town centres and transport interchanges, in particular at Bethnal Green and Mile End.
5. Strengthen the role and function of the new Local Industrial Location at Thomas Road, ensuring employment sensitively integrates with the surrounding residential communities.

### Revitalising our town centres

6. Reinforce and complement the local distinctiveness of Chrisp Street Market town centre, through a range of retail uses and unit sizes, in particular smaller units aimed at existing independent retail providers.
7. Sustain and reinforce a variety and mix of uses in the new neighbourhood centre in Burdett Road South to create a positive sense of place.
8. Contribute to the vitality and mix of uses on key major routes such as Commercial Road and Mile End Road, as well as town centres (Roman Road West, Ben Jonson Road and Limehouse) which have low commercial occupancy rates.

### Protecting and managing our environment

<sup>83</sup> Capacity figures derive from the housing trajectory (see appendix 7) and the Employment Land Review and Town Centre Retail Capacity Study (both published in 2016). The job and floorspace targets are based on GLA and Experian figures. The latter study assessed the existing district centres of Roman Road East and Roman Road West.

9. Support the provision of innovative waste management and recycling storage and collection systems.
10. Support the expansion of the borough's energy network by exploring the potential of creating a district heating centre in the cluster areas (Stepney, Mile End and Bethnal Green).
11. Improve the ecology of the area and ensure an overall net gain in biodiversity.
12. Improving air quality and reducing exposure to poor air quality.

### Enhancing open spaces and water spaces

13. Direct residential moorings to appropriate locations and ensure they do not result in overconcentration or have an adverse impact on residential amenities.
14. Provide an active edge along the waterway network, and enhance physical and visual access through sites and new or improved routes.
15. Maximise on-site provision of green infrastructure (including open space in areas of open space deficiency) and ensure it is joined up to the green grid network.
16. Improve the unique ecological and historic character of the waterways (including), Mile End Park and Victoria Park and support their function and role as a recreational focal points for the area and the borough as a whole
17. Enhance the green corridor between Mile End Park and Victoria Park as well as the area surrounding the Bow Common Gas works site, through improved footways, the greening of facades and incorporating trees and street planters.
18. Improve east-west links through enhancements and expanded green links, particularly at St. Paul's Way and along Commercial Road.

### Improving connectivity and travel choice

19. Remove and overcome barriers to walking and cycling movement and ensure existing and new communities across the sub-area are connected to the wider network of new and improved strategic and local connections.

20. Support connectivity and public realm improvements around transport interchanges at Mile End, Bethnal Green, Limehouse and Shadwell.
21. Improve links to the waterways in order to increase access to commuter and leisure-based services.

### Site allocations

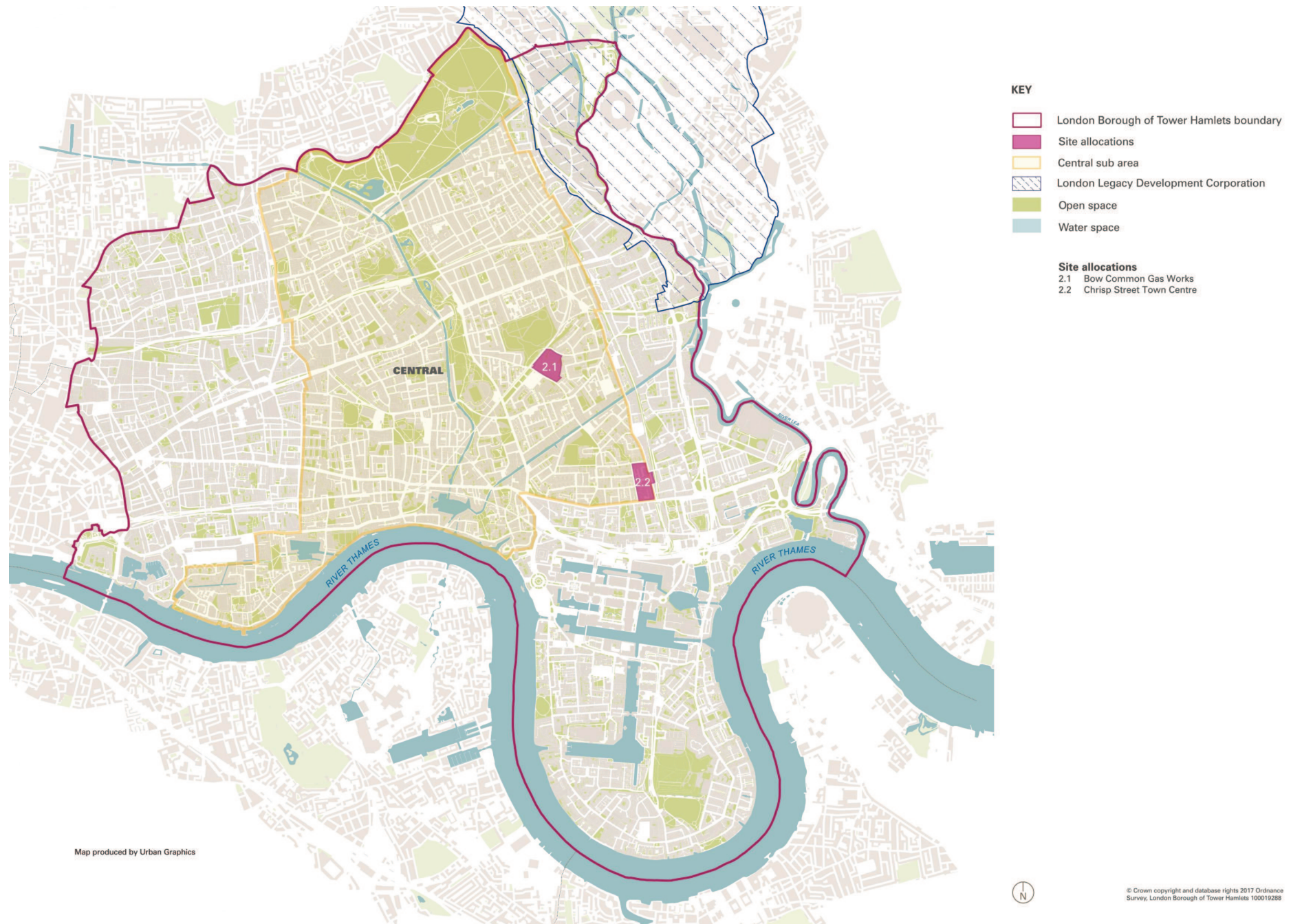
3.6 The site allocations for the Central sub-area are:

- 2.1 Bow Common Gas Works; and
- 2.2 Chrisp Street Town Centre.

3.7 In total, the site allocations will potentially deliver at least 1,146 new homes. The land use, infrastructure and design requirements for each site allocation are set out in the following profiles.



Figure 29 :Central site allocations



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## Bow Common Gas Works

<b>Address</b>	Bow Common Lane	
<b>Size (hectares)</b>	3.94	
<b>Public transport accessibility levels</b>	2 (2017)	2 (by 2031)
<b>Floodzone(s)</b>	1	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>Housing</li> <li>Provision of employment numbers through a range of floor spaces which support small-to-medium enterprises, creative industries and retail.</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>Strategic open space (1 hectare)</li> <li>Secondary school</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>respond positively to the existing scale, height, massing and fine urban grain of the surrounding built environment;</li> <li>integrate the site with Tower Hamlets Cemetery Park through new or improved pedestrian and cycle routes;</li> <li>ensure safe pedestrian and cycling access to the secondary school;</li> <li>locate family housing overlooking the publicly accessible open space;</li> <li>provide new open space with a minimum size of 1 hectare, which is consolidated and designed to provide multi-functional leisure and recreational uses;</li> <li>integrate the site into the green grid route along Knapp Road and Bow Common Lane;</li> <li>improve biodiversity and ecology within open space and green infrastructure;</li> <li>improve walking and cycling connections to, from and through the site, specifically to address poor permeability created by the site. These should align with the existing urban grain to support legibility, specifically joining Knapp Road to Bow Common Lane;</li> <li>improve public realm with active site edges, specifically along Bow Common Lane;</li> <li>provide active frontages along the railway to enhance the use and setting of the railway arches as a non-designated heritage asset; and</li> <li>implement noise screening measures/or a green buffer in areas bordering the railway line.</li> </ul>	
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>Development should address the impact of air quality through mitigation measures.</li> <li>Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.</li> </ul>	

Figure 30 :Bow Common Gas Works



Site Allocation 2.1:  
Bow Common Gas Works

KEY

-  Site boundary
-  Open space
-  Public square
-  Noise or air screening/green buffer
-  Strategic pedestrian/ cycling routes
-  Green grid
-  Local pedestrian/ cycling routes
-  Rail viaduct



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## Chrisp Street Town Centre



<b>Address</b>	Chrisp Street / East India Road / Kerbey Street	
<b>Size (hectares)</b>	3.62	
<b>Public transport accessibility levels</b>	3-5 (2017)	3-6a (by 2031)
<b>Floodzone(s)</b>	2	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Retail and other compatible commercial uses including leisure uses such as a cinema</li> <li>• Housing</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Idea store (re-provision)</li> <li>• Local market (re-provision)</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• deliver a regenerated town centre for Poplar with a range of unit sizes (including those suitable for independent and small local retailers), a market square and a re-provided idea store located on East India Dock Road;</li> <li>• respond positively to the existing character, scale, height, massing and urban grain of the post-war architecture and surrounding built environment, specifically the Lansbury Estate to the west and Poplar Baths to the south;</li> <li>• protect and enhance heritage assets on site and in the surrounding areas, including the Lansbury Estate and conservation area to the west and Poplar Baths to the south;</li> <li>• improve walking and cycling connections to, from and within the site - specifically to Langdon Park and All Saints DLR station. These should align with the existing urban form and grain to support east-west connectivity and wider permeability;</li> <li>• integrate the site with the green grid route, helping to improve access from East India Dock Road to the north and Bartlett Park;</li> <li>• improve the public realm with active site edges, specifically along East India Dock Road and towards all surrounding and internal streets and public spaces; and</li> <li>• reinforce and complement local distinctiveness and create a positive sense of place with improved visual connections to, from and within the site - specifically to Langdon Park and All Saints DLR station and the characteristic clocktower.</li> </ul>	
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>• Development should re-provide the idea store and ensure it is located within a central position.</li> <li>• Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment. Local residents should also be fully consulted on any future proposals within this area.</li> <li>• Development should ensure sufficient and well-integrated access arrangements for highways and servicing.</li> <li>• Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.</li> </ul>	

Figure 31 :Chrip Street town centre



Site Allocation 2.2:  
Chrip Street Town Centre

KEY

-  Site boundary
-  Active ground floor uses
-  Public square
-  Strategic pedestrian/ cycling routes
-  Green grid
-  Local pedestrian/ cycling routes



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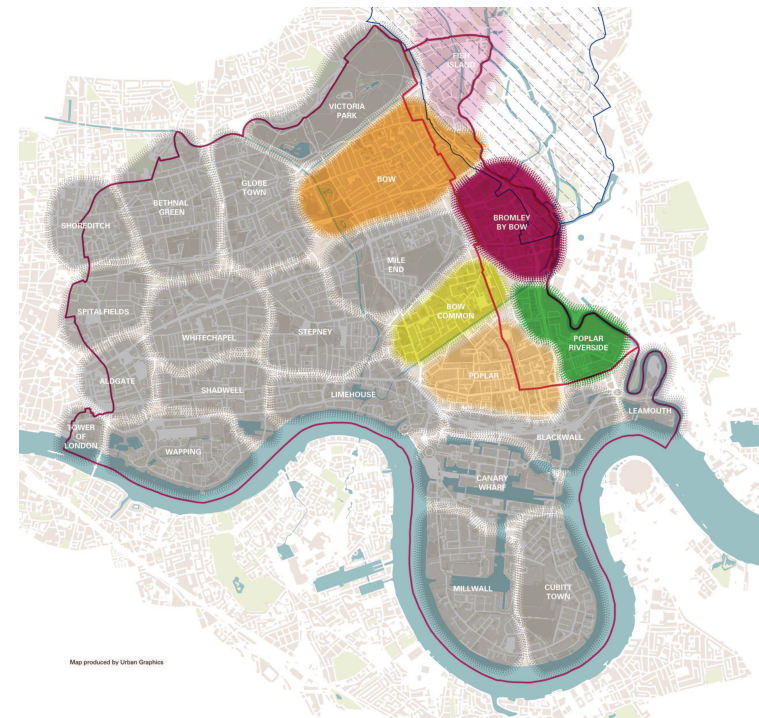


## Chapter 4: Sub-area 3: Lower Lea Valley

### Location

- 4.1** The Lower Lea Valley sub-area is located on the eastern side of the borough and forms part of the wider London Plan's Lower Lea Valley opportunity area which stretches north comprising the London boroughs of Newham and Hackney.
- 4.2** The London Legacy Development Corporation lies to the east of this area, and is the planning authority for the Fish Island and Bromley-by-Bow character places within the borough, as well as Queen Elizabeth Olympic Park and surrounding areas.
- 4.3** The sub-area is a collection of vibrant and distinctive town centres, transport interchanges and residential areas. The sub-area comprises 6 distinct character places. The Tower Hamlets Urban Structure and Characterisation Study provides further information on the key elements of the local character of each place.

Figure 32 :Character places in Lower Lea Valley



### Vision for Lower Lea Valley

By 2031, the Lower Lea Valley will experience comprehensive regeneration and redevelopment of former and underused industrial areas. Connectivity will be transformed with a series of new bridges and riverside walkways across the River Lea, and crossings along the A12 and A13, which will integrate existing and new communities in the area.

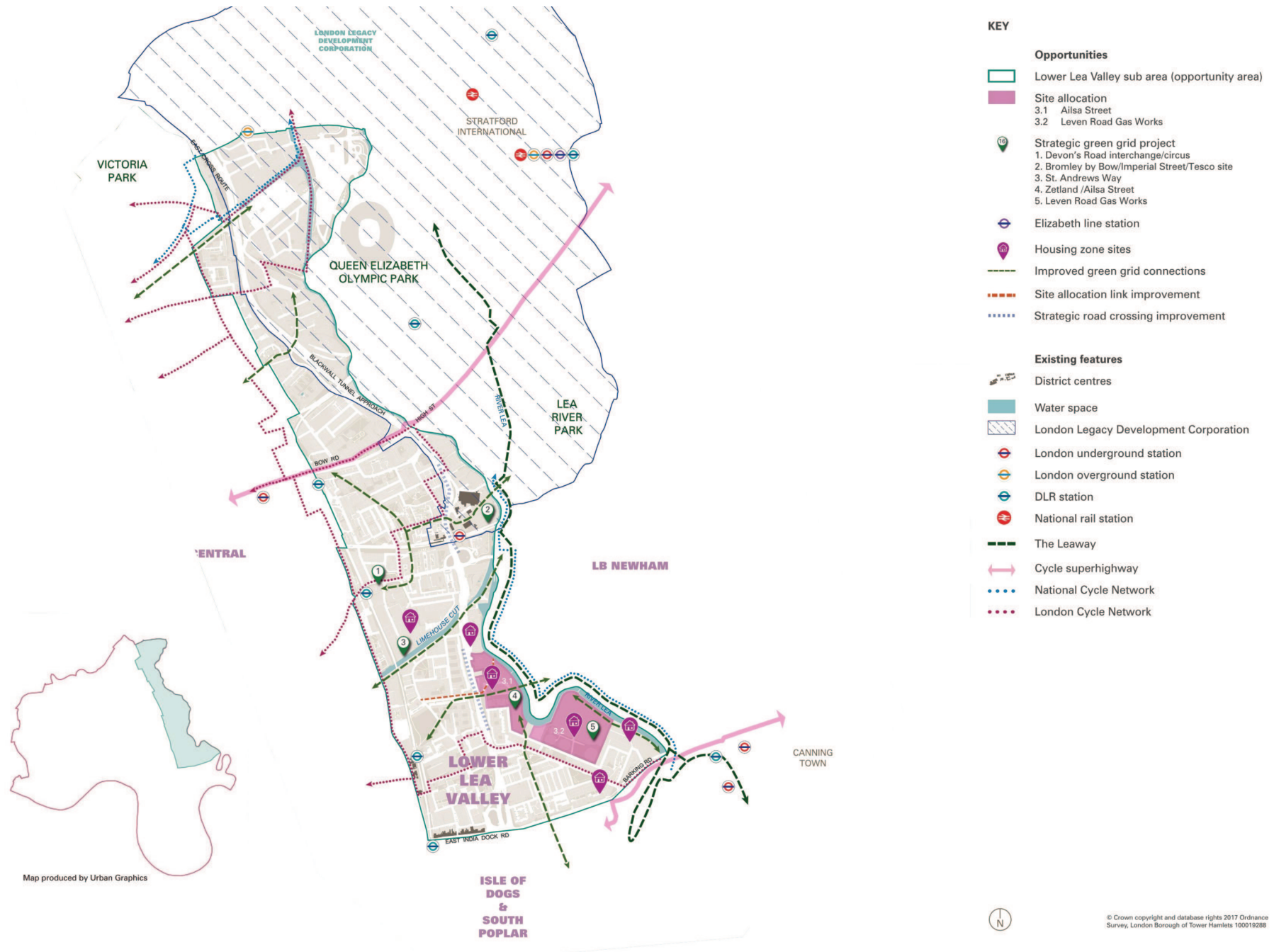
The development of the Lea River Park (including the Leaway) will provide a new strategic publicly green space and a series of new pedestrian and cycling routes, linking the River Lea to London's wider green grid network.

Development in the area will have sufficient transport and social infrastructure to facilitate the creation of thriving mixed communities alongside vibrant neighbourhood centres. Housing provision will be accelerated through the Poplar Riverside Housing Zone and delivered alongside new local employment, enterprise and business opportunities.

4.4 To achieve this vision, our objectives are to:

- improve strategic connections to overcome the physical barriers to movement created by the A12, A13 and the waterways;
- deliver the Lea River Park (including the Leaway) to provide a network of interconnected water and open spaces, green walking and cycling routes and improve access to and along the River Lea;
- improve local connections by creating a street pattern that increases permeability for ease of pedestrian and cyclist movement;
- support existing and new neighbourhood centres by improving accessibility to them to ensure they act as the civic heart to surrounding communities;
- contribute towards the delivery of new affordable homes and community facilities through Poplar Riverside Housing Zone regeneration; and
- optimise former industrial/employment land and protect designated industrial areas whilst sensitively integrating industrial activities into their site context.

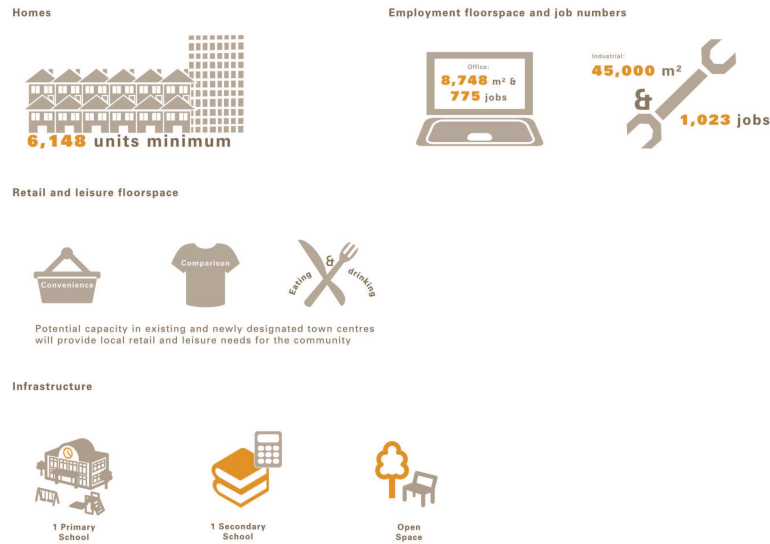
Figure 33 :Vision for Lower Lea Valley





**Development potential**

**4.5** By 2031, development within the Lower Lea Valley will be required to accommodate the following uses to meet the future needs of the borough<sup>(84)</sup>.



**Delivering sustainable places: Lower Lea Valley sub-area development principles**

**4.6** In line with policy S.SG1, all development in the Lower Lea Valley sub-area will seek to deliver the following.

**Creating attractive and distinctive places**

1. Re-use existing heritage buildings and ensure they are well integrated into new development.
2. Respect and respond to the historic industrial character of the area and reinforce its local distinctiveness.
3. Maximise opportunities to provide access to the waterways and ensure buildings and public spaces positively respond and engage with the wateredge.
4. Improve public realm and provide active frontages along the A12 and A13 to addresses the severance.
5. Support the provision of family housing, affordable workspace and new liveable neighbourhoods which benefit from the best possible urban design.

**Meeting housing needs**

6. Contribute to the delivery of new homes by creating a network of lifetime neighbourhoods for new and existing communities.
7. Maximise the provision of affordable housing, as well as a tenure mix and unit sizes that reflect the local housing needs and priorities, in particular family housing.

**Delivering economic growth**

8. Retain and encourage employment use particularly within the strategic industrial locations and local industrial locations.
9. Work with managed workspace providers to ensure the provision, management and maintenance of employment workspace is flexible and responds to the local economic needs of micro and small businesses, including those within the creative, technological and cultural sectors, alongside supporting facilities (e.g. childcare).
10. Support the expansion and provision of creative and digital clusters which support training, technology and incubator workspaces within new development, especially along the A12.

**Revitalising our town centres**

84 Capacity figures derive from: the housing trajectory (see appendix 7), Tower Hamlets Employment Land Review and the Town Centre Retail Capacity Study (both published in 2016). The job and floorspace targets are based on GLA and Experian figures. The required infrastructure has been identified in the Infrastructure Delivery Plan.

11. Strengthen the role and function of town centres through encouraging activity with a range of retail units and employment business spaces, including small shops and workspaces suitable for independent operators.
12. Provide complementary retail uses outside town centres to support new development. Retail provision should ensure an appropriate balance of town centres uses which do not detract from, or threaten the role and function of nearby town centres.

### Protecting and managing our environment

13. Contribute positively towards biodiversity and ecology through landscaping that will create a unique building setting by bringing green spaces and wetland areas into the built environment.
14. Support the provision of innovative waste management and recycling storage and collection systems.
15. Improving air quality and reducing exposure to poor air quality.
16. Provide buffers comprising green infrastructure along the A12 and A13 to mitigate noise and air pollution.

### Enhancing open spaces and water spaces

17. Expand and enhance the green grid network through new links and provision of planters, green walls and other green infrastructure, particularly along Devons Road DLR station, along and across the Limehouse Cut and the area surrounding Ailsa Street site allocation.
18. Create a riverside walk with provision of open space along the edge of River Lea to providing strategic green links to sites in the area.
19. Secure the delivery of the Lea River Park (including the Leaway) in line with the principles identified in the Lea River Park Design Guide and Primer.

### Improving connectivity and travel choice

20. Overcome barriers to movement and ensure existing and new communities across the sub-area are integrated via a network of new and improved strategic and local connections, including the promotion of walking, cycling and the use of public transport.

21. Improve the area's permeability and legibility to key destinations, aligning development with the existing street network and providing new or improved links with the green grid network.
22. Deliver additional crossings over the A12, A13 and the River Lea at identified suitable locations, to provide cross-borough connections including proposed additional footbridges at Ailsa Street and Leven Road.
23. Support the provision of new and extended bus routes through sites to maximise access to public transport.

### Relevant links

- 4.7 A number of planning policy documents are particularly relevant to this area and should be considered alongside the guidance in this section. These include the following.

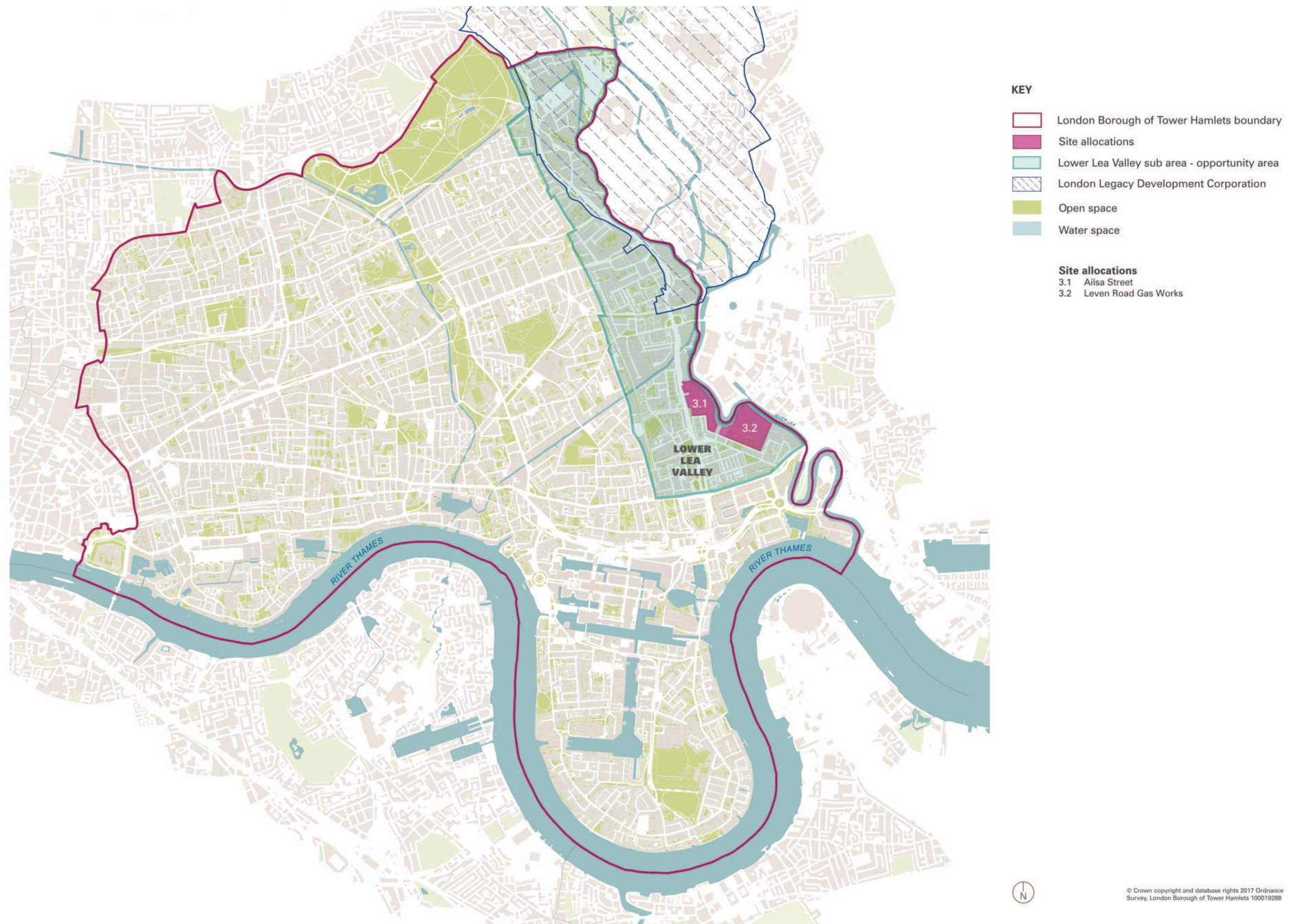
Greater London Authority	London Legacy Development Corporation	London borough of Tower Hamlets
<ul style="list-style-type: none"> <li>• Lower Lea Valley Opportunity Area Framework (2008)</li> <li>• Olympic Legacy Supplementary Planning Guidance (2011)</li> </ul>	<ul style="list-style-type: none"> <li>• Local Plan (2015)</li> <li>• Hackney Wick and Fish Island Supplementary Planning Document (2016)</li> <li>• Bromley-by-Bow Supplementary Planning Document (2016)</li> </ul>	<ul style="list-style-type: none"> <li>• Bromley-by-Bow Masterplan Supplementary Planning Document (2012)</li> <li>• Ailsa Street Planning Framework (2016)</li> </ul>

### Site allocations

- 4.8 The site allocations for the Lower Lea Valley sub-area are:
- 3.1 Ailsa Street
  - 3.2 Leven Road Gas Works

**4.9** In total, the site allocations will potentially deliver at least 2,346 new homes. The land use, infrastructure and design requirements for each site allocation are set out in the following profiles.

Figure 34 :Lower Lea Valley site allocations





**Ailsa Street**

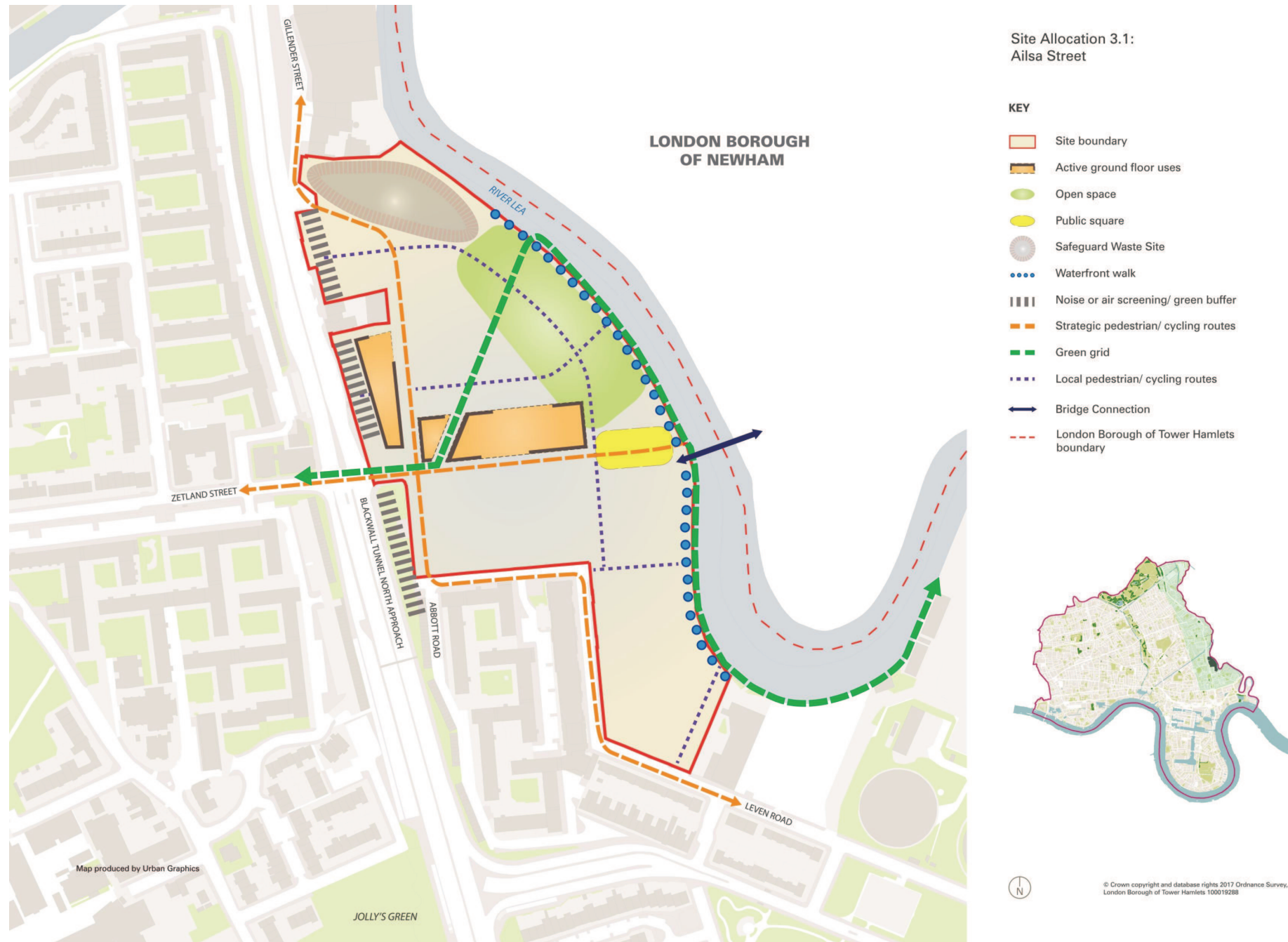
<b>Address</b>	Ailsa Street	
<b>Size (ha)</b>	5.76	
<b>Public transport accessibility levels</b>	1a-3 (2017)	1a-3 (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: Provision of employment numbers through a range of floor space sizes which support small-to-medium enterprises, creative industries and retail</li> <li>• Retention of the safeguarded waste site</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> <li>• Primary school</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and urban grain of the surrounding built environment;</li> <li>• protect or enhance and integrate heritage assets on site, including Poplar public library and Bromley Hall and in the surrounding areas;</li> <li>• mitigate the impact of noise and air pollution generated by the A12, with a green buffer and/or alternative mitigation measures;</li> <li>• step back from the River Lea to avoid excessive overshadowing and provide active frontage on the riverside;</li> <li>• improve walking and cycling connections to, from and within the site - specifically to and along the River Lea to Bromley-by-Bow district centre, Aberfeldy neighbourhood centre and to Langdon Park DLR station. These should align with the existing urban grain to support permeability and legibility;</li> <li>• integrate the site with the green grid route to assist with activating the riverside and improve access to the wider Lea River Park and further north to the Queen Elizabeth Olympic Park;</li> <li>• provide an active and well-defined street frontage along Lochnagar Street, and create a stronger east-west link between the River Lea and the Langdon Park DLR station;</li> <li>• improve riverside accessibility and provide amenity in the form of consolidated publicly accessible open space;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• improve the quality and create a positive sense of place in the form of an active square at the corner of the A12 and Lochnagar Street;</li> <li>• provide and secure the necessary land to facilitate the delivery of a new bridge over the River Lea; and</li> <li>• facilitate a new or extended bus route through the site to enhance access to public transport.</li> </ul>	

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### Delivery considerations

- Effective engagement between landowners, developers and leaseholders is needed to facilitate potential land assembly and comprehensive redevelopment.
- The construction and operation of a waste management facility on the safeguarded site will need to accord with policy S.MW1.
- Access to public transport and delivery of a walking and cycling bridge across the River Lea will need to be improved in line with the phasing of development and in coordination with the London borough of Newham.
- Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.

Figure 35 :Ailsa Street





## Leven Road Gas Works

<b>Address</b>	Leven Road	
<b>Size (hectares)</b>	8.56	
<b>Public transport accessibility levels</b>	0-2 (2017)	0-2 (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: Provision of employment numbers through a range of floor space sizes which support small-to-medium enterprises, creative industries and retail</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Strategic open space (1 hectare)</li> <li>• Secondary school</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its riverside location. It will require active frontages that fit well with the existing 2-3 storey terraced houses facing the site and sensitive to the scale of the adjacent 2-storey residential area, and the amenity of rear gardens backing onto the site;</li> <li>• strongly encourage the retention, reuse and enhancement of the existing non-designated heritage asset, Gasholder No.1, which is located in the south-west corner of the site, due to its local character and landmark merit;</li> <li>• reflect the industrial heritage of the site through measures such as, but not limited to, public art, landscaping and building design;</li> <li>• step back from the River Lea to avoid excessive overshadowing and enable activation of the riverside;</li> <li>• maximise the provision of family homes;</li> <li>• consider opportunities to provide bespoke waste collection (e.g. Underground waste systems);</li> <li>• ensure the open space is designed and usable for sport and recreation and located adjacent to the River Lea, featuring the Leaway and water spaces. It should meet the minimum size of 1 hectare;</li> <li>• improve walking and cycling connections to, from within the site - specifically to link with the river Lea Park walk, Aberfeldy neighbourhood centre to Langdon Park DLR station and East India DLR station;</li> <li>• improve public realm with active site edges, specifically along Leven Road;</li> <li>• integrate the site with the green grid route to assist with activating the riverside and improve access from the open space to the wider Lea River Park and further north to the Queen Elizabeth Olympic Park;</li> <li>• provide safe pedestrian and cycling access to the secondary school;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> </ul>	

	<ul style="list-style-type: none"> <li>• provide and secure the necessary land to facilitate the delivery of a new bridge over the River Lea; and</li> <li>• facilitate a new or extended bus route through the site to enhance access to public transport.</li> </ul>
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>• Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution caused by the gas works.</li> <li>• Access to public transport and delivery of a walking and cycling bridge across the River Lea will need to be improved in line with the phasing of development and in coordination with London Borough of Newham.</li> <li>• Open space should be delivered in the earliest phase of development.</li> <li>• Development should accord with flood mitigation and adaptation measures in the borough’s Strategic Flood Risk Assessment and sequential test.</li> </ul>

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Figure 36 :Leven Road Gas Works

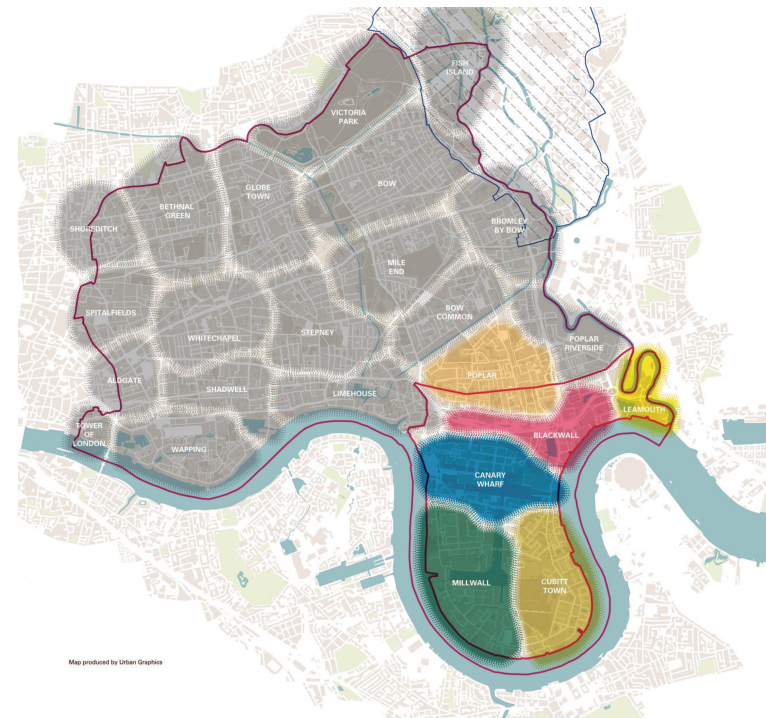


## Chapter 5: Sub-area 4: Isle of Dogs and South Poplar

### Location

- 5.1 The Isle of Dogs and South Poplar sub-area is located to the south-east of the borough, bounded by the River Thames to the south, River Lea and the London borough of Newham to the east, and East India Dock Road to the north.
- 5.2 The sub-area falls within the London's Plan's Isle of Dogs and South Poplar opportunity area.
- 5.3 The sub-area is a collection of vibrant and distinctive town centres, employment hubs, transport interchanges and residential areas. The sub-area comprises 6 distinct character places (see figure 37). The Tower Hamlets Urban Structure and Characterisation Study provides further information on the key elements of the local character of each place.

Figure 37 :Character places in Isle of Dogs and South Poplar



### Vision for Isle of Dogs and South Poplar

By 2031, the Isle of Dogs and South Poplar will have a cohesive mix of housing, employment and leisure uses within distinctive, inclusive and vibrant neighbourhoods, which have a strong sense of place.

South Poplar will be integrated with neighbouring areas in the Isle of Dogs, capitalising on the opportunities in Canary Wharf and Blackwall. New development at Canary Wharf will reinforce and strengthen its role as a global business centre. There will be additional local employment opportunities in South Poplar and Isle of Dogs to support a range of flexible start-ups and small-to-medium enterprises.

Development will be exemplar high quality and capable of accommodating densities to support sustainable places and reinforce local character. This will result in a greener and more attractive living and working environment, befitting the waterfront setting.

Redevelopment of sites will also support revitalised town centres (including new neighbourhood centres at South Quay and London City Island) and a range of functions, such as community facilities and play spaces.

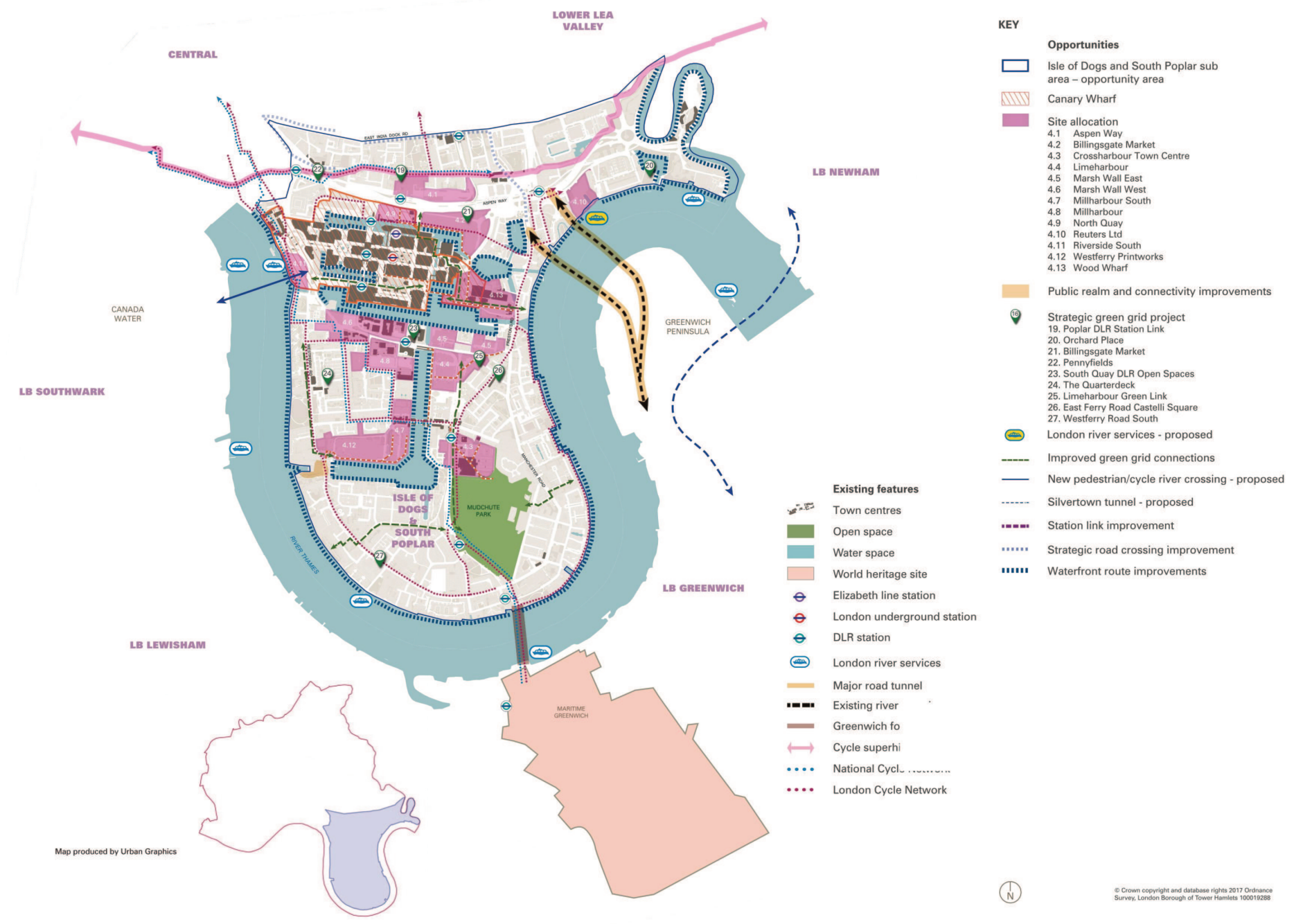
The opening of the Elizabeth line will facilitate the provision of new homes and jobs to serve both existing and future communities. New and enhanced connections across strategic roads, docks and the River Thames, together with public realm improvements, will enhance walking and cycling across the area. Further improvements to the sustainable transport network (including enhancements to the Docklands Light Railway and river-based services) will allow people to better access jobs, services and visitor attractions.

#### 5.4 To achieve this vision, our objectives are to:

- support the delivery of high quality interconnected places which respond to local heritage assets and the area's distinctive character;
- address severance across the area and to surrounding areas through connectivity enhancements as well as new linkages over the waterways and road network;
- manage development intensification and associated impacts on the environment and existing communities;
- support vibrant and mixed town centres through enhancing the office employment offer in Canary Wharf as well as a range of flexible small-to-medium enterprises in surrounding areas;
- deliver new and improved open and water spaces, which are accessible and well integrated into new development; and
- improve the transport network and secure the necessary strategic and local infrastructure, such as schools, health and community facilities.

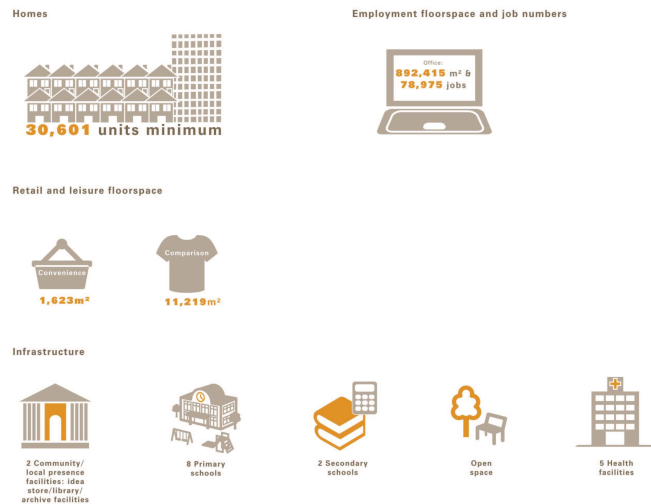


Figure 38 :Vision for Isle of Dogs and South Poplar



## Development potential

**5.5** By 2031, development within the Isle of Dogs and South Poplar sub-area will be required to accommodate the following uses to meet the future needs of the borough<sup>(85)</sup>.



## Delivering sustainable places: Isle of Dogs and South Poplar sub-area development

**5.6** In line with policy S.SG1, all development in the Isle of Dogs and South Poplar sub-area will seek to deliver the following.

## Creating attractive and distinctive places

1. Reinforce or complement the local historic distinctiveness to create a sense of place that responds positively to the waterways, views, the setting and significance of existing buildings, streetscape and the wider context, including character and heritage assets.
2. Deliver massing in a varied but coherent manner that provides defined and engaging streets and spaces, while maximising levels of natural light and a transition in scale from surrounding areas.
3. Address the setting of taller buildings at street level with urban block structures comprising podiums and plinths to ensure a sense of human scale and clear street pattern that defines and improves routes and spaces.
4. Deliver a well-defined urban block pattern with active frontages focusing on non-residential uses facing onto primary routes including Marsh Wall, Millharbour, Limeharbour, docksides and public open spaces, with clear distinctions between public, communal and private spaces.

## Meeting housing needs

5. Deliver a range of housing typologies to include town houses, flats, maisonettes, and duplexes, with high quality and well-defined private amenity space, including winter gardens that are separated from the main house.
6. Provide wheelchair accessible and family housing with generous floor space and well-designed private amenity space on the lower levels to enable ease of access to street level.

## Delivering economic growth

7. Protect existing and direct new large office employment floorspace to Canary Wharf (preferred office locations) to maintain its role and function, benefitting from improved access via the new Elizabeth line.
8. Provide a range of flexible and affordable employment space around Marsh Wall, Poplar High Street, Blackwall (local employment location)

85 Please note: the housing target represents a cautious estimate of the Tower Hamlets housing land supply position in relation to the London Plan target and the objectively assessed needs identified through the Tower Hamlets Strategic Housing Market Assessment (2017). The employment and retail capacity figures derive from the Tower Hamlets Employment Land Review (2016) and the Tower Hamlets Town Centre Strategy (2017-2022). The strategy assessed Canary Wharf and Crossharbour town centres for retail capacity in comparison and convenience. The required infrastructure has been identified in the Tower Hamlets Infrastructure Delivery Plan. Provision will be sought through the site allocations.



and Leamouth to support the growth of small-to-medium enterprises as well as supporting services (e.g. childcare space) to help break down barriers to employment.

**Revitalising our town centres**

- 9. Promote the expansion of retail, leisure and complementary commercial employment provision in Canary Wharf to support its potential re-designation as a metropolitan centre.
- 10. Strengthen the role and function of Crossharbour as a district centre by creating a 'high street' environment along Pepper Street, focusing food and leisure around Glengall Bridge with community uses in the heart of the town centre.
- 11. Facilitate the provision of new neighbourhood centres at South Quay and London City Island, with ground floor active retail units along key routes, and support the convenience needs of the emerging community.

**Protecting and managing our environment**

- 12. Support the expansion of the borough's energy network by exploring the potential of creating a district heating centre at Canary Wharf.
- 13. Improve the ecology of the area and ensure an overall net gain in biodiversity.
- 14. Support the provision of innovative waste management and recycling storage and collection systems.
- 15. Improving air quality and reducing exposure to poor air quality.

**Enhancing open spaces and water spaces**

- 16. Facilitate the delivery of useable, high quality new and improved publicly accessible open space that is well integrated into the green grid network, including a new park at Millwall Slipway.
- 17. Improve the green grid network through the greening of facades, provision of green features, such as trees, green walls and planters, particularly at Poplar DLR station, Orchard Place, East India Dock Basin, Billingsgate Market, West India Dock, Canary Wharf, Quarterdeck, Limeharbour and along East Ferry Road and Westferry Road.
- 18. Create a series of smaller open spaces, particularly around South Quay station.

**Improving connectivity and travel choice**

- 19. Overcome barriers to movement, particularly across the A13, Aspen Way and the waterways to ensure existing and new communities across the sub-area are integrated via a network of new and improved strategic and local connections, including the promotion of walking, cycling and the use of public transport.
- 20. Ensure a continuous and vibrant riverside walkway along the Thames Path, linking Greenwich to the River Lea Park.
- 21. Optimise the efficiency of freight and waste collection services, including onsite consolidation centres and support the reuse of Orchard Wharf to facilitate freight services.
- 22. Support the extension of river services: a new pier at Canary Wharf East and additional crossings between Leamouth and Canning Town and between Canary Wharf and Canada Water to meet immediate demand for these connections to the surrounding area.

**Relevant links**

**5.7** A number of planning policy documents are particularly relevant to this area and should be considered alongside the guidance in this section. These include:

Table 9

Greater London Authority	London borough of Tower Hamlets
<ul style="list-style-type: none"> <li>• Isle of Dogs and South Poplar Opportunity Area Planning Framework Supplementary Planning Document (emerging)</li> </ul>	<ul style="list-style-type: none"> <li>• South Quay Masterplan Supplementary Planning Document (2015)</li> <li>• Millennium Quarter Public Realm Guidance (2010)</li> </ul>

**Site allocations**

**5.8** The site allocations for the Isle of Dogs and South Poplar sub-area are:

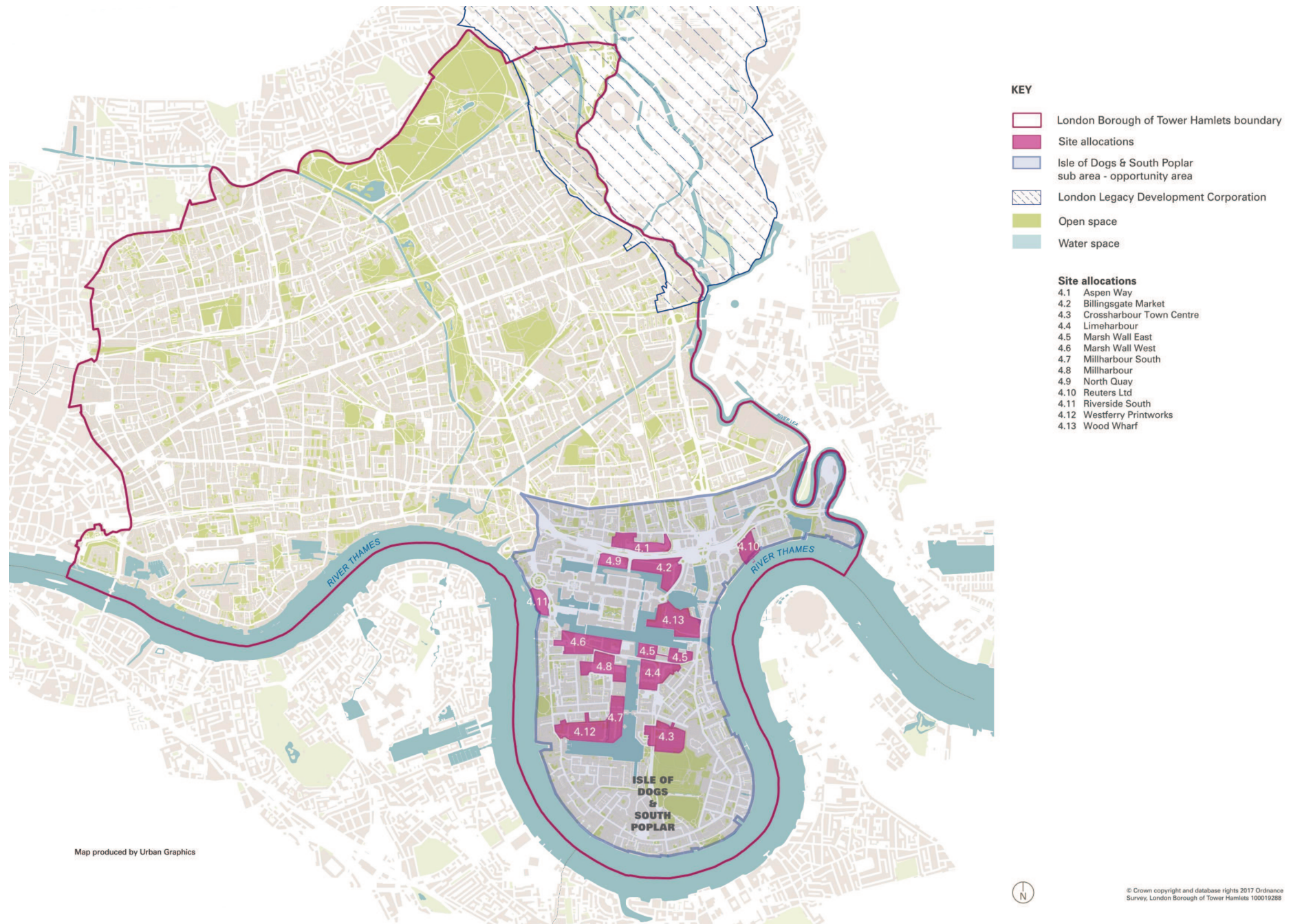
- 4.1 Aspen Way
- 4.2 Billingsgate Market

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- 4.3 Crossharbour Town Centre
- 4.4 Limeharbour
- 4.5 Marsh Wall East
- 4.6 Marsh Wall West
- 4.7 Millharbour South
- 4.8 Millharbour
- 4.9 North Quay
- 4.10 Reuters Ltd
- 4.11 Riverside South
- 4.12 Westferry Printworks
- 4.13 WoodWharf

**5.9** In total, the site allocations will potentially deliver at least 19,984 new homes. The land use, infrastructure and design requirements for each site allocation are set out in the following profiles.

Figure 39 :Isle of Dogs and South Poplar site allocations



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## Aspen Way

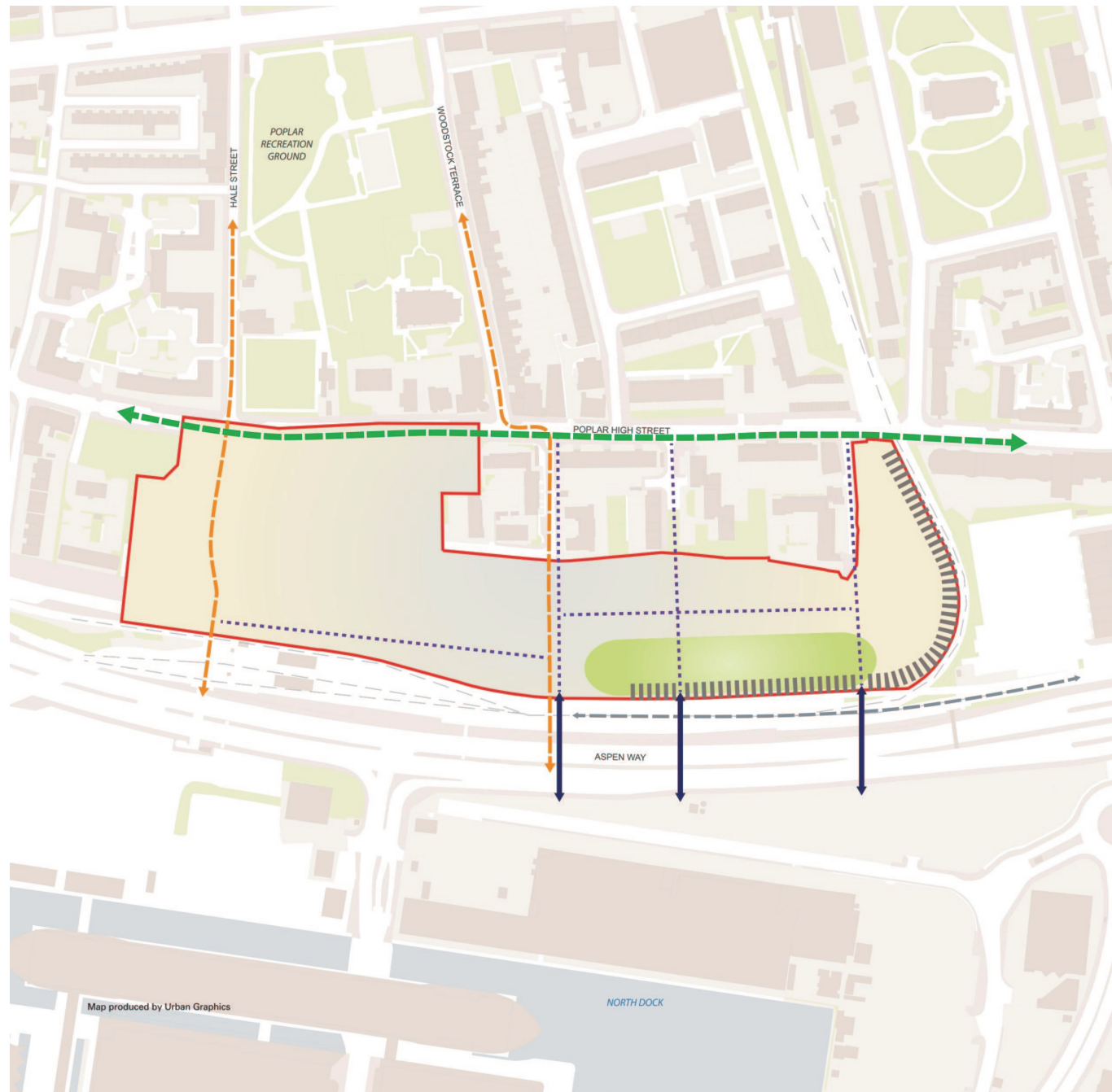
<b>Address</b>	Aspen Way	
<b>Size (hectares)</b>	6.10	
<b>Public transport accessibility levels</b>	3-5 (2017)	3-6a (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>Housing</li> <li>Employment: a range of floorspace sizes, including small-to-medium enterprises</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>Strategic open space (1 hectare)</li> <li>College (re-provision)</li> <li>Community centre and associated football pitches (re-provision)</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>respond positively to the existing character scale, height, massing and urban grain of the surrounding built environment. The setting of adjacent housing should also be protected through appropriate screening and landscaping;</li> <li>protect or enhance heritage assets on site and in the surrounding areas, including the grade II listed college building situated along the northern boundary;</li> <li>restore and/or enhance connections between neighbouring site allocations and ensure the streetscape and the wider context, including design and character are addressed;</li> <li>maximise the provision of family homes;</li> <li>address the physical barriers and poor connectivity created by Aspen Way, with new and improved to walking and cycling routes. This could be facilitated through the provision of new bridges or decking across Aspen Way connecting the site to Billingsgate Market;</li> <li>integrate the site with the green grid route along Poplar High Street;</li> <li>improve the quality of spaces around and between buildings and movement through area;</li> <li>strengthen walking and cycling connections to Poplar DLR station, Poplar High Street, East India Dock Road and Canary Wharf station;</li> <li>address the environmental impacts of Aspen Way with a green buffer and/or alternative mitigation measures; and</li> <li>improve the quality and create a positive sense of place with a public square and public green open space that integrates north-south links and Poplar DLR station.</li> </ul>	
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>Development should enable the continued use of the existing depot.</li> </ul>	

- Development should not undermine the delivery of the long term aspiration for new bridges or decking over Aspen Way.
- Development should accord with any flood mitigation and adaptation measures stated within the borough’s Strategic Flood Risk Assessment and the sequential test.



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Figure 40 :Aspen Way



Site Allocation 4.1:  
Aspen Way

**KEY**

- Site boundary
- Open space
- Noise or air screening/ green buffer
- Strategic pedestrian/ cycling routes
- Green grid
- Local pedestrian/ cycling routes
- Bridge Connection
- Rail viaduct



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**Billingsgate Market**

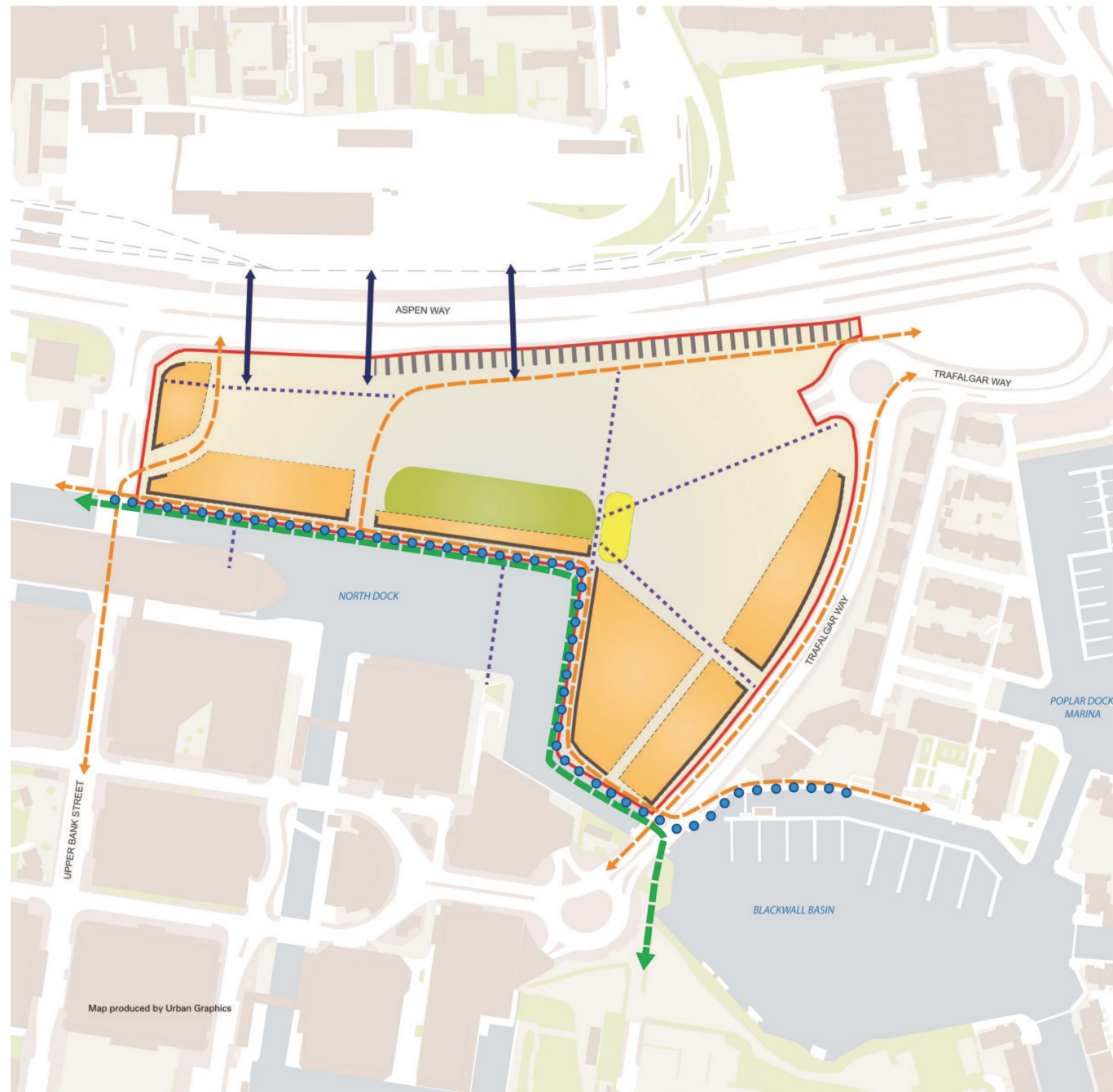
<b>Address</b>	Trafalgar Way	
<b>Size (hectares)</b>	5.74	
<b>Public transport accessibility levels</b>	3-5 (2017)	4-6a (by 2031)
<b>Floodzone(s)</b>	2-3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Employment: Preferred Office Location (secondary) with ancillary supporting uses such as gyms, hotels, restaurants and retail.</li> <li>• Housing (25% maximum provision in terms of floorspace)</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> <li>• Secondary school</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and urban grain of the surrounding built environment, particularly the dockside, adjacent buildings and along Trafalgar Way;</li> <li>• restore and/or enhance connections between neighbouring strategic site allocations and ensure the streetscape and the wider context, including design and character are addressed;</li> <li>• protect or enhance the statutory listed accumulator tower;</li> <li>• improve walking and cycling connections to, from and within the site, particularly with a new east to west cycle route through the site. Walking and cycling routes should specifically address the barrier of Aspen Way and integrate the site with Poplar to the north; North Quay and Canary Wharf Crossrail station; and to the wider area. These routes should align with the existing urban grain to support permeability and legibility;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• improve public realm (specifically along Upper Bank Street) to address the severance caused by Trafalgar Way;</li> <li>• enhance legibility and have a clear distinction between public and private spaces, by way of improving public realm particularly along the dockside, and providing a continuous walkway with supporting active ground floor uses and frontages;</li> <li>• address the environmental impacts of Aspen Way with a green buffer and/or alternative mitigation measures;</li> <li>• prevent excessive overshadowing and enable activation of the dockside by stepping back development from West India Dock; and</li> <li>• maximise accessibility to the waterside and enhance its setting.</li> </ul>	
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>• The operations of the Billingsgate Market should be appropriately reprovided in a suitable location within London.</li> </ul>	



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- Development should support the delivery requirement to provide new bridges or decking across Aspen Way.
- Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.

Figure 41 :Billingsgate Market



Site Allocation 4.2:  
Billingsgate Market

KEY

- Site boundary
- Active ground floor uses
- Open space
- Public square
- Waterfront Walk
- Noise or air screening/ green buffer
- Strategic pedestrian/ cycling routes
- Green grid
- Local pedestrian/ cycling routes
- Bridge Connection



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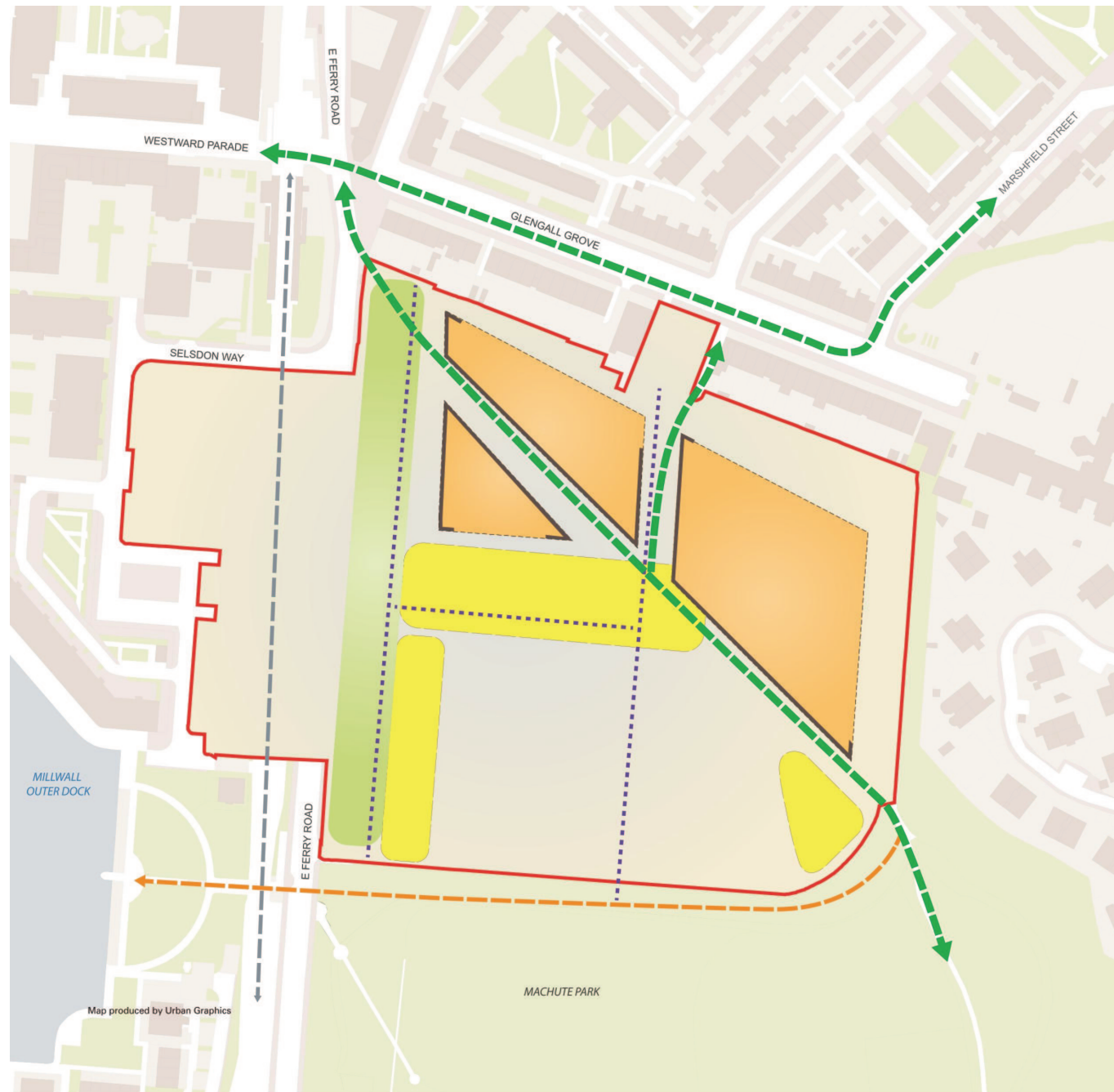
## Crossharbour Town Centre

<b>Address</b>	East Ferry Road	
<b>Size (hectares)</b>	4.89	
<b>Public transport accessibility levels</b>	1b-5 (2017)	1b-5 (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Redevelopment of the district centre providing retail floorspace and other compatible uses.</li> <li>• Housing</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Primary school</li> <li>• Community/local presence facility</li> <li>• Health centre (re-provision and expansion)</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• create a new town centre with an anchor supermarket and a range of retail, leisure and community uses with sizes which can support independent providers. Retail streets and other routes should provide active frontages;</li> <li>• respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and Mudchute Park. Specifically, it should acknowledge the low rise nature of the immediate residential area to the north and east;</li> <li>• reinforce and complement local distinctiveness and create a positive sense of place with the provision of a new public square in the centre that frames development;</li> <li>• integrate the development into the green grid route;</li> <li>• protect or enhance the setting of the Maritime Greenwich world heritage site and other surrounding heritage assets;</li> <li>• improve biodiversity and ecology within open space and green infrastructure;</li> <li>• improve walking and cycling connections to, from and across the site to establish connections to the new public square, Crossharbour DLR station and Mudchute Park. These routes should acknowledge the existing urban grain to support permeability and legibility;</li> <li>• secure the provision of a bus interchange which should be incorporated into the redevelopment of the site; and</li> <li>• improve public realm with active site edges, specifically along East Ferry Road and adjacent to Mudchute Park.</li> </ul>	
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>• The health centre and community facility should be re-provided in association with the new community/local presence facility.</li> </ul>	

- A new supermarket should be provided before the existing supermarket is redeveloped to ensure a continued service for local people.
- Delivery of new routes and the public square should be prioritised within the phasing timetable.
- Development should connect, or demonstrate potential to connect to the Barkantine energy centre to help expand the local energy network.
- Development should accord with any flood mitigation and adaptation measures stated within the borough’s Strategic Flood Risk Assessment and the sequential test.

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Figure 42 :Crossharbour Town Centre



Site Allocation 4.3:  
Crossharbour Town Centre

**KEY**

-  Site boundary
-  Active ground floor uses
-  Open space
-  Public square
-  Strategic pedestrian/ cycling routes
-  Green grid
-  Local pedestrian/ cycling routes



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**Limeharbour**

<b>Address</b>	Limeharbour	
<b>Size (hectares)</b>	4.87	
<b>Public transport accessibility levels</b>	3-4 (2017)	3-4 (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: a range of floorspace sizes, including small-to-medium enterprises</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Strategic open space (1 hectare)</li> <li>• Primary school</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• complement the tall building cluster in Canary Wharf through appropriate taller building heights, whilst respecting and being informed by the existing character, scale, height, massing, views and urban grain of its dockside location and surrounding built environment, particularly the lower rise buildings of Cubitt Town to the south-east;</li> <li>• create a series of buildings scales with a well-articulated built form and skyline, avoiding significant adverse environmental impacts, including overshadowing of adjacent sites either within the area or outside, particularly along the main routes of Marsh Wall and Limeharbour;</li> <li>• protect or enhance the setting of heritage assets in and around the area, including the historic docks and the setting of the Maritime Greenwich world heritage site to the south;</li> <li>• create a legible, permeable and well-defined movement network through the site, centred on Millwall and Marsh Wall connecting to the surrounding existing street network and docksides, with a new bridge crossing to the north;</li> <li>• integrate buildings with improved public realm and ensure development is stepped back from the docksides with fully accessible active frontages;</li> <li>• maximise the provision of family homes;</li> <li>• improve walking and cycling connections to, from and within the site - specifically between Oakland Quay and Limeharbour; Limeharbour and East Ferry Road; and between the dock sides, Canary Wharf (Major Centre) and Mudchute Park. These routes should align with the existing urban grain to support permeability and legibility;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• provide active frontages and access along the dockside to create a series of interconnected spaces in accordance with the green grid;</li> </ul>	

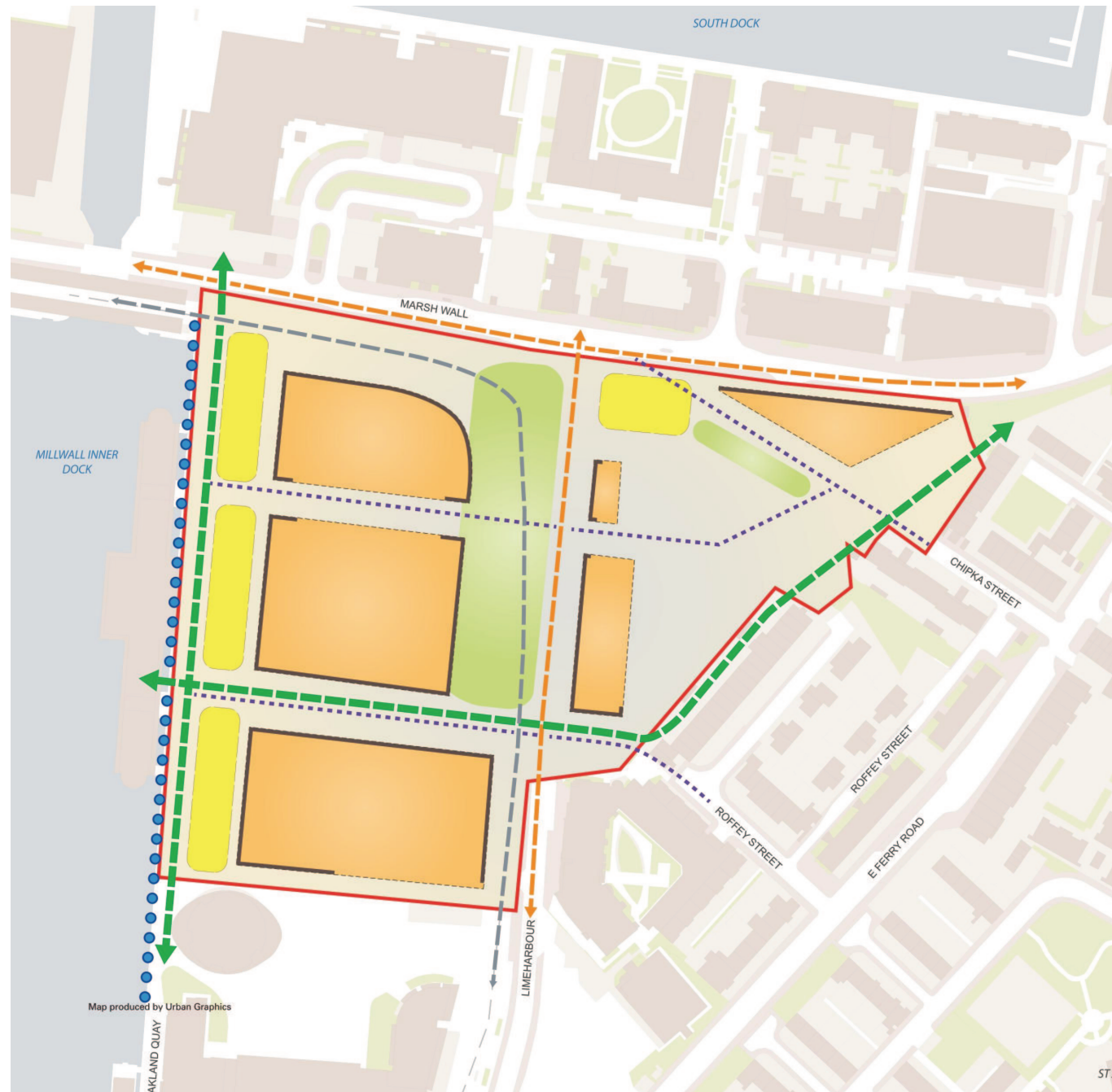


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	<ul style="list-style-type: none"><li>• improve the quality of and create a positive sense of place with an arrival point in the form of an active square at the corner of Marsh Wall and Limeharbour; and</li><li>• provide well defined public green open space or public squares with active building frontages around the DLR viaduct. The open space should be well integrated into the development.</li></ul>
<b>Delivery considerations</b>	<ul style="list-style-type: none"><li>• Development should accord with the design principles set out in the latest supplementary guidance for South Quay.</li><li>• Development should connect or demonstrate potential to connect to the Barkantine energy centre to help expand the local energy network.</li><li>• Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.</li></ul>



Figure 43 :Limeharbour



Site Allocation 4.4:  
Limeharbour

KEY

- Site boundary
- Active ground floor uses
- Open space
- Public square
- Waterfront Walk
- Strategic pedestrian/ cycling routes
- Green grid
- Local pedestrian/ cycling routes
- Rail viaduct



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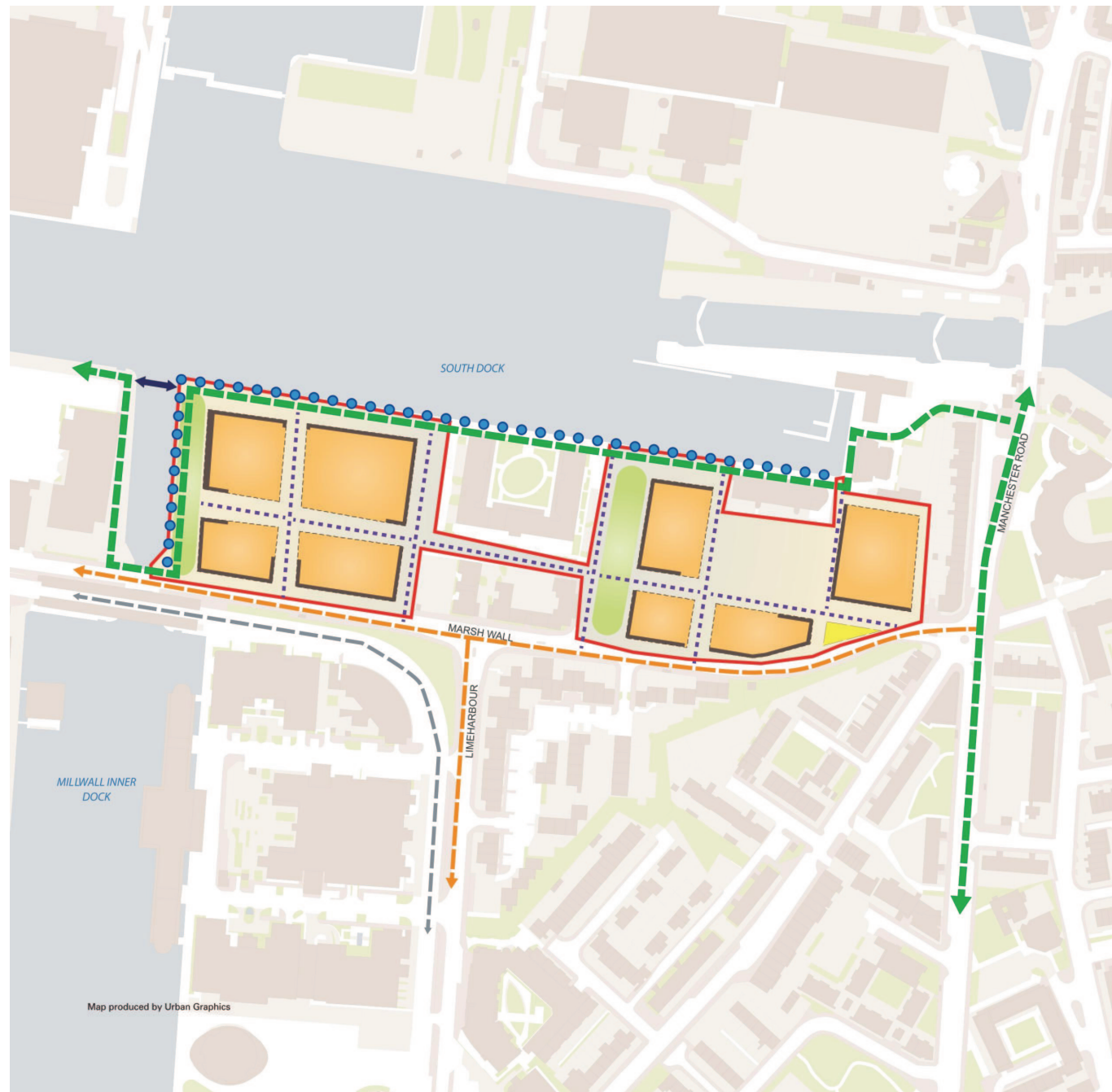
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## Marsh Wall East

<b>Address</b>	Marshwall	
<b>Size (hectare)</b>	3.42	
<b>Public transport accessibility levels</b>	3- 4 (2017)	3-4 (by 2031)
<b>Floodzone(s)</b>	2-3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: a range of floorspace sizes, including small-to-medium enterprises</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> <li>• Primary school</li> <li>• Health centre</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• complement the tall building cluster in Canary Wharf through appropriate building heights, whilst respecting and being informed by the existing character, scale, height, massing, views and urban grain of its dockside location and surrounding built environment, particularly the lower rise buildings of Cubitt Town to the south-east;</li> <li>• create a series of building scales with a well-articulated built form and skyline, avoiding significant adverse environmental impacts, including overshadowing of adjacent sites either within the area or outside, particularly along the main routes of Marsh Wall and Limeharbour;</li> <li>• protect or enhance the setting of heritage assets in and around the area, including the historic docks and the setting of the Maritime Greenwich world heritage site to the south;</li> <li>• create a legible, permeable and well-defined movement network through the site, centred on Millwall and Marsh Wall connecting to the surrounding existing street network and docksides;</li> <li>• integrate tall buildings with improved public realm and ensure development steps back from the docksides with fully accessible active frontages;</li> <li>• improve walking and cycling connections to, from and within the site, specifically to the dock sides, Canary Wharf (Major Centre) and Mudchute Park. These routes should align with the existing urban grain to support permeability and legibility;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• provide active frontages and access along the dockside to create a series of interconnected spaces in accordance with the green grid;</li> </ul>	

	<ul style="list-style-type: none"> <li>• improve the quality and create a positive sense of place with an arrival point in the form of an active square at the corner of Marsh Wall and Limeharbour; and</li> <li>• provide well-defined public green open space, particularly along the waterfronts of West India and Millwall Docks and public squares with active building frontages. The open space should be well integrated into the development.</li> </ul>
<p><b>Delivery considerations</b></p>	<ul style="list-style-type: none"> <li>• Development should accord with the design principles set out in the latest supplementary guidance for South Quay.</li> <li>• Effective engagement between landowners and developers will be required to facilitate comprehensive development.</li> <li>• Other social infrastructure needs should be considered and where necessary provided as part of the development in the event that a health centre is not required to support the level of growth.</li> <li>• Development should re-provide and intensify existing employment floorspace.</li> <li>• Development should connect to or demonstrate potential to connect to the Barkentine energy centre to help expand the local energy network.</li> <li>• Development should accord with flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and sequential test</li> </ul>

Figure 44 :Marsh Wall East



Site Allocation 4.5:  
Marsh Wall East

**KEY**

- Site boundary
- Active ground floor uses
- Open space
- Public square
- Waterfront walk
- Strategic pedestrian/ cycling routes
- Green grid
- Local pedestrian/ cycling routes
- Bridge Connection



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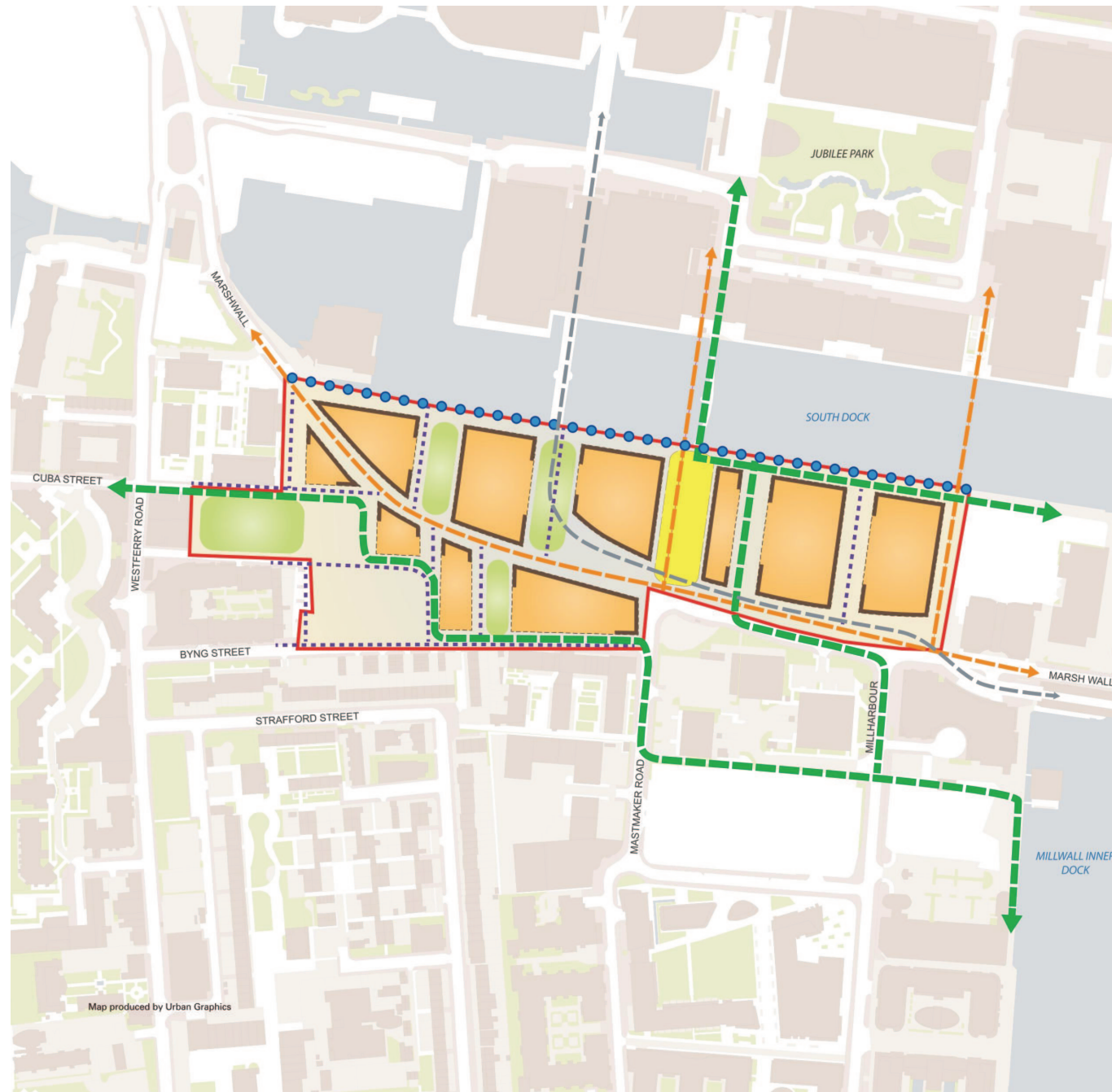
**Marsh Wall West**

<b>Address</b>	Marshwall	
<b>Size (hectares)</b>	6.39	
<b>Public transport accessibility levels</b>	4 (2017)	4-5 (2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: a range of floorspace sizes, including small-to-medium enterprises</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> <li>• Primary school</li> <li>• Health centre</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• complement the tall building cluster in Canary Wharf through appropriate taller building heights, whilst respecting and being informed by the existing character, scale, height, massing, views and urban grain of its dockside location and surrounding built environment, particularly the lower rise buildings of Millwall to the south-west;</li> <li>• create a series of building scales with a well-articulated built form and skyline, avoiding significant adverse environmental impacts, including overshadowing of adjacent sites either within the area or outside, particularly along the main routes of Marsh Wall;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• protect and enhance the setting of the Maritime Greenwich world heritage site and other surrounding heritage assets, including the historic dockside promenade;</li> <li>• prevent excessive overshadowing of the riverside and enable activation of the waterfront by ensuring development is stepped back;</li> <li>• integrate the site with the green grid route along Marsh Wall, Byng Street, Mastmaker’s Road, Millharbour and the edges of South Dock and Millwall Inner Dock;</li> <li>• create a legible, permeable and well-defined movement network, centred on Millharbour and Marsh Wall;</li> <li>• incorporate active frontages to surrounding streets and spaces, including the waterside and accessible high quality public space along the entire dockside;</li> </ul>	

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	<ul style="list-style-type: none"> <li>• improve and enhance walking and cycling connections to, from and within the site, and provide legible and pedestrian friendly connections between Marsh Wall and South Quay Walk, particularly from Mastmaker Road to the South Quay footbridge and from Millharbour through a newly proposed footbridge to Upper Bank Street; and</li> <li>• the open spaces around the DLR viaduct should be well defined by public green space or public squares and active building frontages.</li> </ul>
<p><b>Delivery considerations</b></p>	<ul style="list-style-type: none"> <li>• Development should accord with the design principles set out in the latest supplementary guidance for South Quay.</li> <li>• Effective engagement between landowners and developers will be required to facilitate comprehensive development. This will potentially require land assembly and a strong approach to bring forward developments on a joint basis.</li> <li>• Other social infrastructure needs should be considered and where necessary provided as part of the development in the event that a health centre is not required to support the level of growth.</li> <li>• Development should connect to, or demonstrate potential to connect to the Barkentine energy centre to help expand the local energy network.</li> <li>• Development should accord with any flood mitigation and adaptation measures stated within the borough’s Strategic Flood Risk Assessment and the sequential test</li> </ul>

Figure 45 :Marsh Wall West



Site Allocation 4.6:  
Marsh Wall West

KEY

- Site boundary
- Active ground floor uses
- Open space
- Public square
- Waterfront walk
- Strategic pedestrian/ cycling routes
- Green grid
- Local pedestrian/ cycling routes
- Rail viaduct



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## Millharbour South

<b>Address</b>	Millharbour, South	
<b>Size (hectares)</b>	4.09	
<b>Public transport accessibility levels</b>	2-3 (2017)	2-3 (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: a range of floorspace sizes, including small-to-medium enterprises</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> <li>• Primary school</li> <li>• Health centre</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its dockside location; specifically, it should step down from Canary Wharf to the smaller scale residential areas south of Millwall Dock;</li> <li>• protect and enhance the setting of the Maritime Greenwich world heritage site and other surrounding heritage assets, including the historic dockside promenade;</li> <li>• protect or enhance the waterside setting, ensuring public accessibility along the entire waterfront;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• prevent excessive overshadowing and enable activation of the riverside by ensuring development is stepped back from the waterside;</li> <li>• integrate the site with the green grid route along Marsh Wall, Byng Street, Mastmaker’s Road, Millharbour and the edges of South Dock and Millwall Inner Dock;</li> <li>• create a legible, permeable and well-defined movement network, centred on Millharbour, Pepper Street and the dockside;</li> <li>• reinforce and complement local distinctiveness and create a positive sense of place along Pepper Street by supporting a mix of uses;</li> <li>• incorporate active frontages to surrounding streets and spaces (including the waterside) and accessible, high quality public space along the entire dockside;</li> </ul>	

	<ul style="list-style-type: none"> <li>• improve and enhance walking and cycling connections to, from and within the site, and provide legible and pedestrian friendly connections across Glengall Bridge; and</li> <li>• incorporate high quality public green open spaces/landscape along Millharbour extending to a park at the south end of Greenwich View facing Millwall Outer Dock.</li> </ul>
<p><b>Delivery considerations</b></p>	<ul style="list-style-type: none"> <li>• Development should connect to, or demonstrate potential to connect to the Barkantine energy centre to help expand the local energy network.</li> <li>• Other social infrastructure needs should be considered and where necessary provided as part of the development in the event that a health centre is not required to support the level of growth.</li> <li>• Open space provision in this location has the potential to expand the permitted open space at Westferry Printworks site allocation.</li> </ul> <p>Development should accord with any flood mitigation and adaptation measures stated within the borough’s Strategic Flood Risk Assessment and the sequential test.</p>

Figure 46 :Millharbour South



Site Allocation 4.7:  
Millharbour South

**KEY**

- Site boundary
- Active ground floor uses
- Open space
- Public square
- Waterfront walk
- Strategic pedestrian/ cycling routes
- Green grid
- Local pedestrian/ cycling routes



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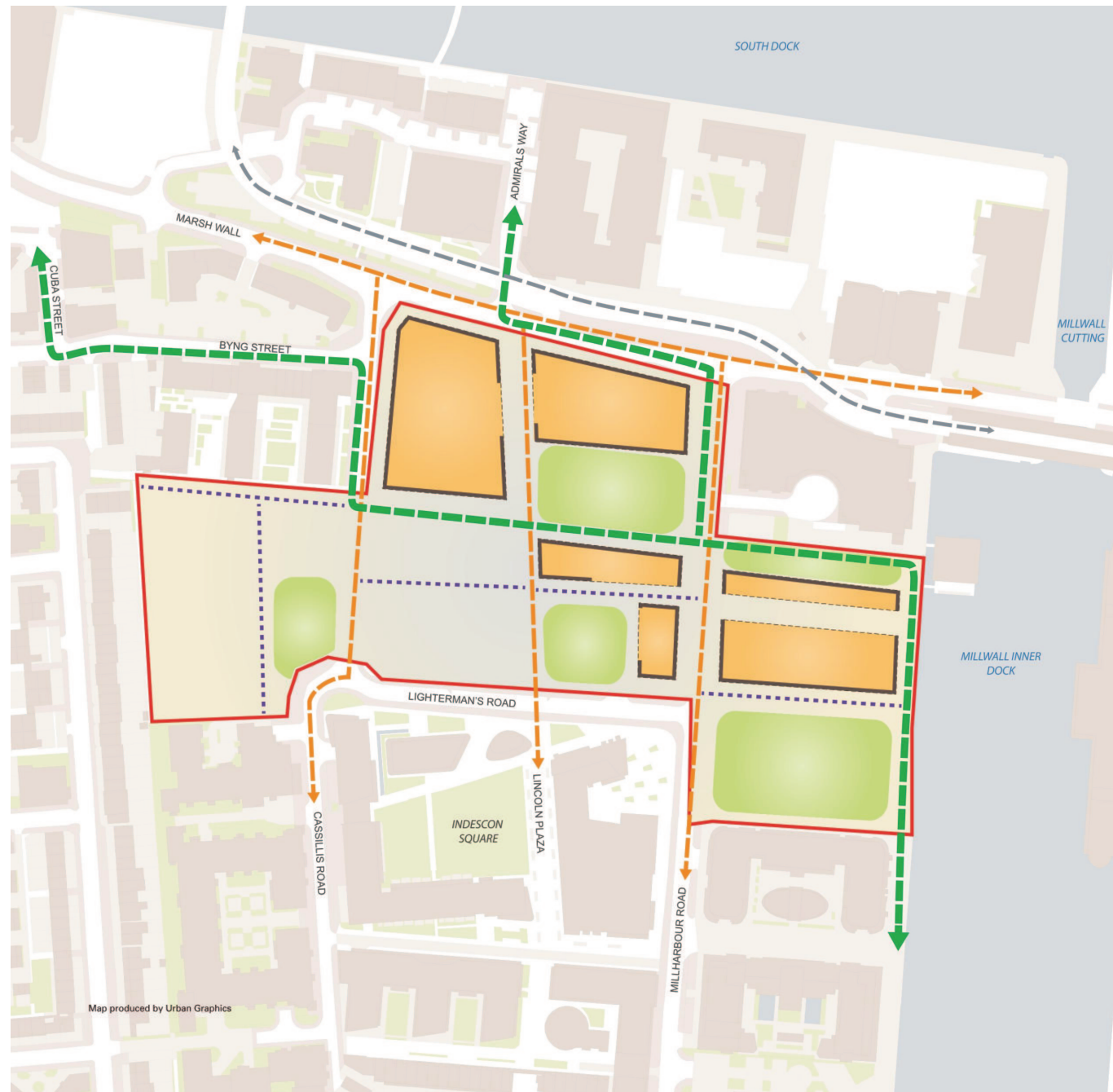
**Millharbour**

<b>Address</b>	Marshwall, Millharbour	
<b>Size (hectares)</b>	3.58	
<b>Public transport accessibility levels</b>	2-3 (2017)	2-3 (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: a range of floorspace sizes, including small-to-medium enterprises</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> <li>• Primary school</li> <li>• Health centre</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its dockside location; specifically, it should step down from Canary Wharf to the smaller-scale residential areas south of Millwall Dock;</li> <li>• protect and enhance the setting of the Maritime Greenwich world heritage site and other surrounding heritage assets including the historic dockside promenade;</li> <li>• prevent excessive overshadowing and enable activation of the riverside by ensuring development is stepped back from the waterside;</li> <li>• integrate the site with the green grid route along Marsh Wall, Byng Street, Mastmaker’s Road, Millharbour and the edges of South Dock and Millwall Inner Dock;</li> <li>• create a legible, permeable and well-defined movement network, centred on Millwall Inner Dock, Millharbour and Marsh Wall;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• incorporate active frontages to surrounding streets and spaces (including the waterside) and accessible, high quality public space along the entire dockside;</li> <li>• improve and enhance walking and cycling connections to, from and within the site, and provide legible and pedestrian friendly connections between Marsh Wall and South Quay Walk, particularly from Mastmaker Road to the South Quay footbridge and from Millharbour through a newly proposed footbridge to Upper Bank Street;</li> </ul>	

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	<ul style="list-style-type: none"><li>• create a positive sense of place with an arrival point in the form of an active square at the corner of South Quay footbridge and Marsh Wall/Mastmaker Road; and</li><li>• high quality public green open spaces/landscape design should be provided within each street block in order to provide sufficient green amenity space.</li></ul>
<b>Delivery considerations</b>	<ul style="list-style-type: none"><li>• Development should accord with the design principles set out in the latest supplementary guidance for South Quay.</li><li>• Effective engagement between landowners, developers and leaseholders will be required to facilitate comprehensive development. This will potentially require a strong partnership approach to bring forward developments on a joint basis.</li><li>• Other social infrastructure needs should be considered and where necessary provided as part of the development in the event that a health centre is not required to support the level of growth.</li><li>• Development should connect or demonstrate potential to connect to the Barkantine energy centre to help expand the local energy network</li><li>• Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.</li></ul>

Figure 47 :Millharbour



Site Allocation 4.8:  
Millharbour

KEY

-  Site boundary
-  Active ground floor uses
-  Open space
-  Strategic pedestrian/ cycling routes
-  Green grid
-  Local pedestrian/ cycling routes
-  Rail viaduct



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## North Quay

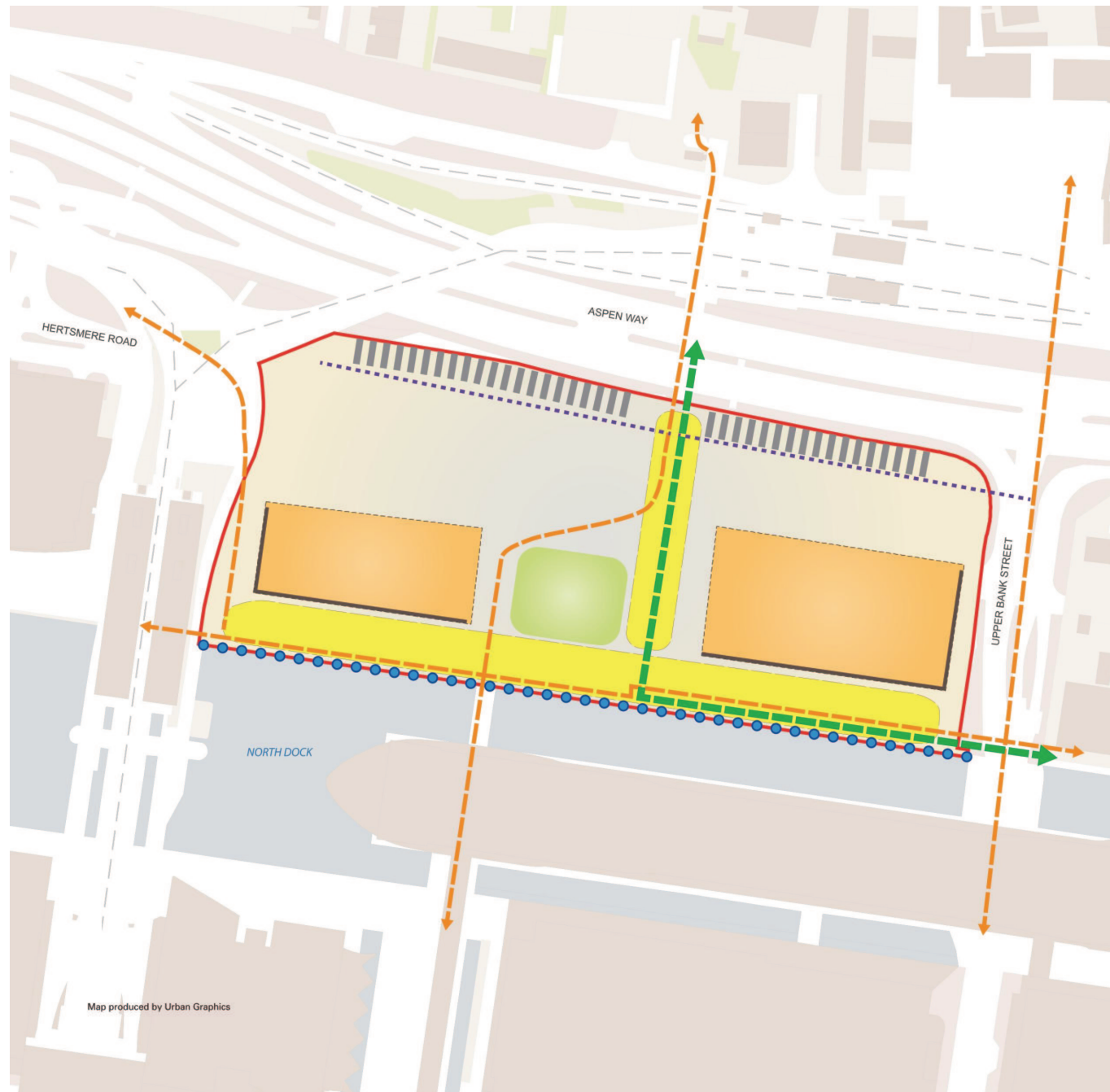
<b>Address</b>	Upper Bank Street	
<b>Size (hectares)</b>	3.27	
<b>Public transport accessibility levels</b>	5-6a (2017)	6a (by 2031)
<b>Floodzone(s)</b>	2-3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Employment: Preferred office location (secondary) with ancillary supporting uses such as gyms, hotels, restaurants and retail.</li> <li>• Housing (25% floorspace in terms of maximum provision)</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> </ul>	
	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and urban grain of the surrounding built environment and its dockside location;</li> <li>• improve strategic links from Canary Wharf to Poplar High Street through the provision of new north-south links;</li> <li>• protect or enhance the waterside setting, ensuring public accessibility along the entire waterfront;</li> <li>• address noise mitigation measures in areas bordering Aspen Way with a green buffer and/or alternative measures;</li> <li>• provide active frontages and access along the dockside to create a series of interconnected spaces in accordance with the green grid;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• improve the quality and create a positive sense of place with an arrival points in the form of an active public square at the northern corners of the site, which interconnects to a north-south linear square from the Canary Wharf station (Elizabeth line) to Poplar DLR station/Poplar High Street; and</li> <li>• improve or enhance walking and cycling connections to, from and within the site to:             <ol style="list-style-type: none"> <li>a. accommodate a new east-to-west cycle route through the site which joins into the cycle network and pedestrians movement to/from the DLR stations at Poplar and West India Quay and the Elizabeth line station;</li> <li>b. facilitate connections across Aspen Way and across Trafalagar Way towards Blackwall Basin, Poplar High Street, and Canary Wharf, and to the wider area; and</li> <li>c. address the barrier of Aspen Way and integrate the site with Poplar to the north, and the Canary Wharf crossrail station to the south west. These routes should align with the existing urban grain to support permeability and legibility.</li> </ol> </li> </ul>	



<b>Delivery considerations</b>	<ul style="list-style-type: none"><li>• Development should not undermine the delivery of the long term aspiration to provide new bridges or decking over Aspen Way.</li><li>• Development should accord with any flood mitigation and adaptation measures stated within the borough’s Strategic Flood Risk Assessment and the sequential test.</li></ul>
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Figure 48 :North Quay



Site Allocation 4.9:  
North Quay

**KEY**

- Site boundary
- Active ground floor uses
- Open space
- Public square
- Waterfront walk
- Noise or air screening/ green buffer
- Strategic pedestrian/ cycling routes
- Green grid
- Local pedestrian/ cycling routes



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Reuters Ltd

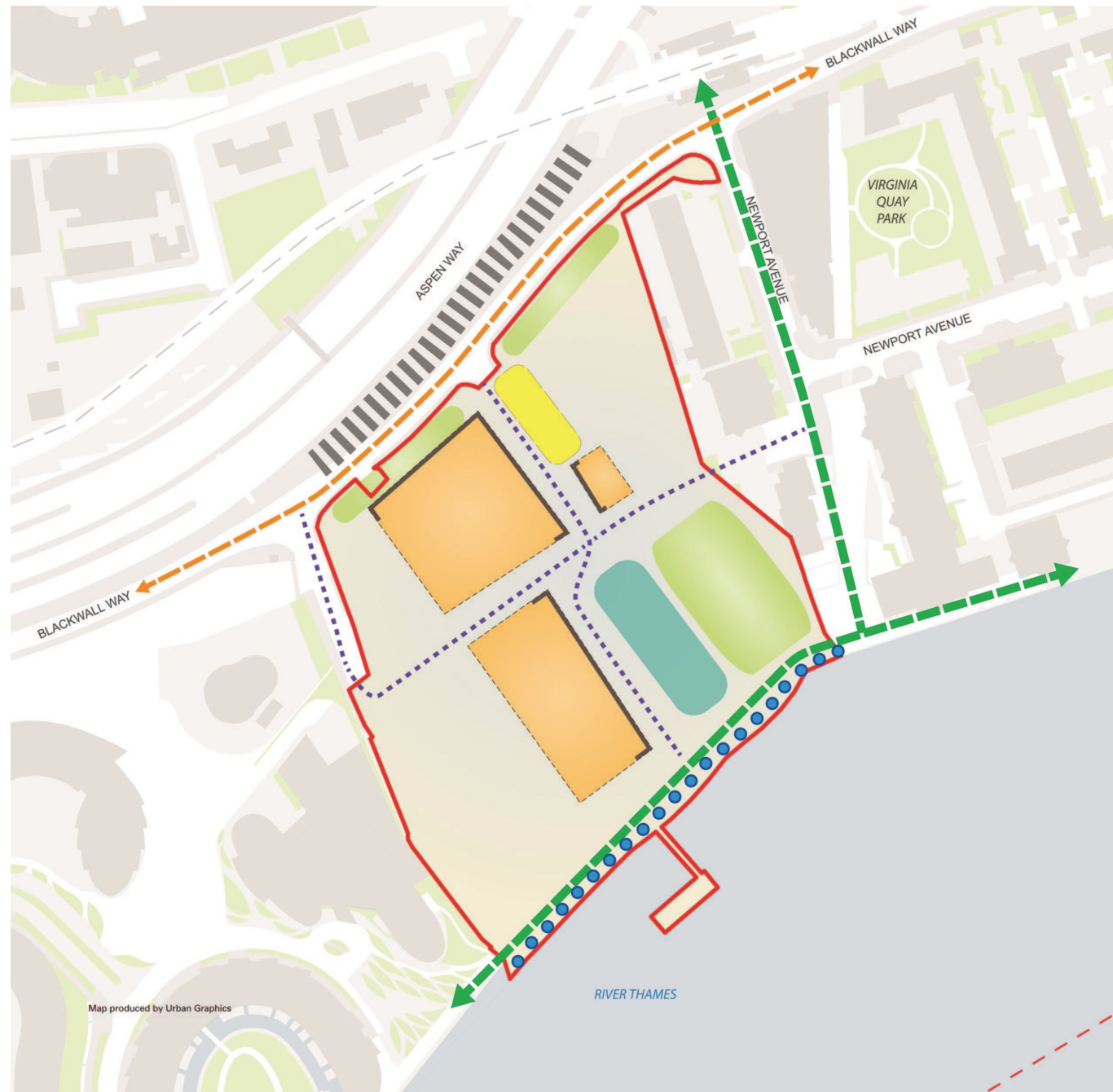
<b>Address</b>	Paul Julius Close	
<b>Size (hectares)</b>	2.71	
<b>Public transport accessibility levels</b>	2-4 (2017)	2-4 (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: re-provision of existing employment by way of intensifying employment job numbers</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> <li>• Primary school</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, specifically addressing the transition of building heights, scale and massing from the tall buildings cluster at Blackwall roundabout to the medium-rise nature of East India;</li> <li>• retain, reuse or enhance the existing heritage assets, including the grade II listed dock and adjacent grade II listed northern ventilation shaft;</li> <li>• provide green buffer and/or alternative mitigation measures along Aspen Way or Blackwall to mitigate the noise and air pollution impacts;</li> <li>• integrate buildings with improved public realm and ensure development is stepped back from the riverside with fully accessible active frontages;</li> <li>• improve walking and cycling connections to, from and within the site, specifically to address the connections to adjacent sites. A continuous pedestrian and cycle link along the Thames Path should be provided;</li> <li>• improve movement through the area and repair fragmented urban form by reinforcing the route with active uses from East India DLR station and Blackwall Way towards the Thames Path and the Blackwall Yard Graving Dock;</li> <li>• create a positive sense of place with an arrival point in the form of an active public square at the corner of Blackwall Way, through Blackwall Yard to the Thames waterfront;</li> <li>• reinforce and complement local distinctiveness with the re-provision of the existing waterspace on site and integrate its function with the open space to maximise amenity provision;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces; and</li> <li>• explore the opportunity to incorporate the existing jetting pier into the development.</li> </ul>	

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## Delivery considerations

- Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.

Figure 49 :Reuters Ltd



Site Allocation 4.10:  
Reuters LTD

KEY

- Site boundary
- Active ground floor uses
- Open space
- Public square
- Enhanced waterspace
- Waterfront walk
- Noise or air screening/ green buffer
- Strategic pedestrian/ cycling routes
- Green grid
- Local pedestrian/ cycling routes
- London Borough of Tower Hamlets boundary



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## Riverside South

<b>Address</b>	Westferry Circus	
<b>Size (ha)</b>	2.17	
<b>Public transport accessibility levels</b>	5 (2017)	5-6a (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Employment: Preferred office location (secondary) with ancillary supporting uses such as gyms, hotels, restaurants and retail</li> <li>• Housing (25% floorspace in terms of maximum provision)</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Small open space (0.4 hectares)</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment;</li> <li>• retain, reuse or enhance the existing heritage assets, including a listed lock wall that forms the eastern boundary of the site;</li> <li>• integrate buildings with improved public realm and ensure development is stepped back from the riverside with fully accessible active frontages;</li> <li>• protect or enhance the waterside setting, ensuring easy public access along the entire waterfront with active retail and commercial uses;</li> <li>• improve walking and cycling connections to, from and within the site - specifically to address connections to Westferry Circus, Westferry Road and the river Thames;</li> <li>• reinstate the active street frontage and pedestrian route along Westferry Circus and Westferry Road, with strong visual and activity links to the riverside amenity;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• provide green open space along the river Thames which is activated with commercial uses and expands on the leisure activity hub at Westferry Circus;</li> <li>• create a new route with a strong visual connection from Bank Street/Westferry Road to the Thames Riverside and integrate it a new riverside walk and public square.</li> </ul>	
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>• Development should not prejudice the potential delivery of a river crossing across the Thames.</li> <li>• Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.</li> </ul>	



Figure 50 :Riverside South



Site Allocation 4.11:  
Riverside South

KEY

- Site boundary
- Active ground floor uses
- Open space
- Public square
- Waterfront walk
- Strategic pedestrian/ cycling routes
- Green grid
- Local pedestrian/ cycling routes



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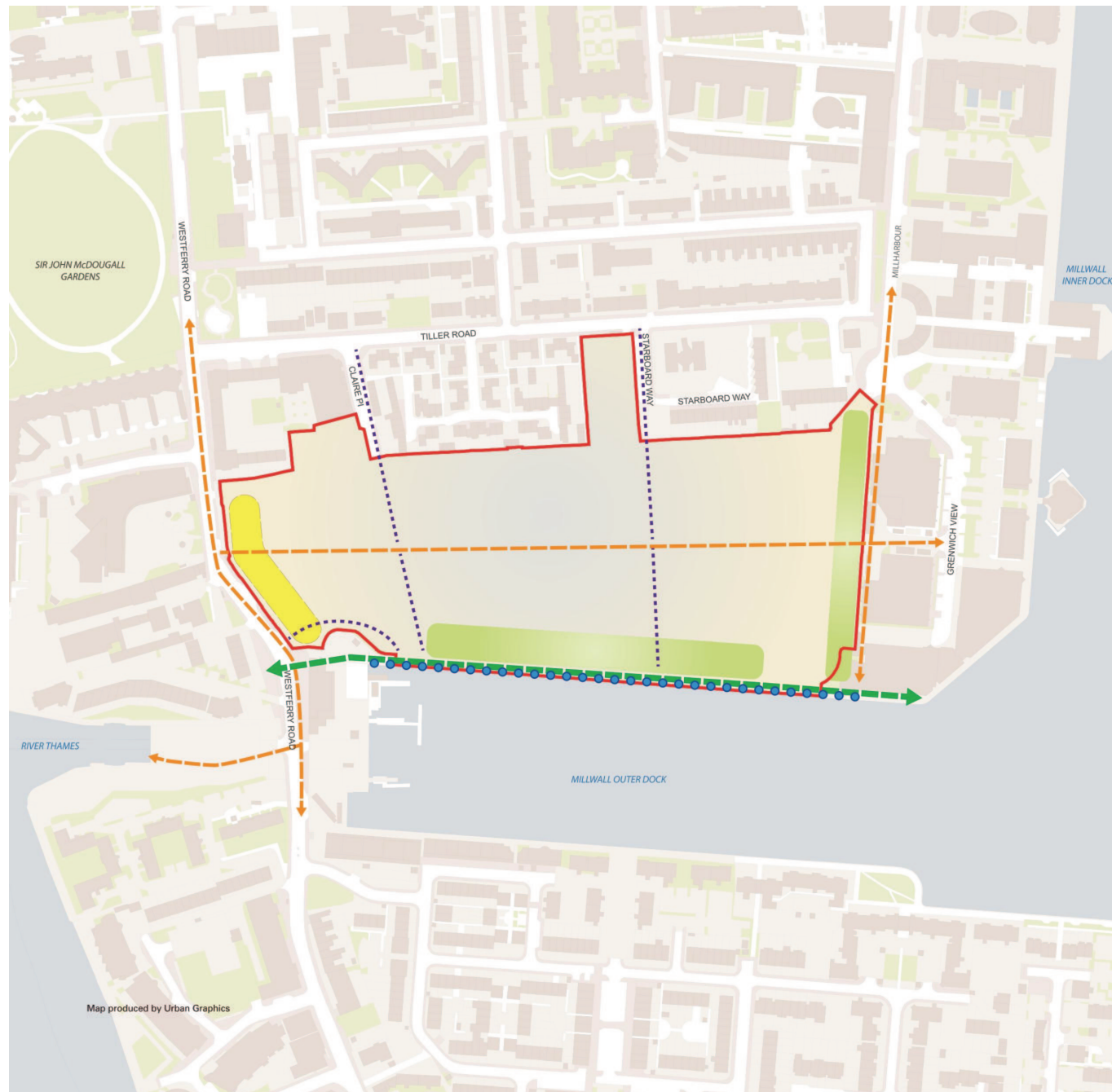
Map produced by Urban Graphics



## Westferry Print Works

<b>Address</b>	Westferry Road	
<b>Size (hectares)</b>	6.16	
<b>Public transport accessibility levels</b>	1b-2 (2017)	1b-2 (by 2031)
<b>Floodzone</b>	3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: re-provision of existing employment by way of intensifying employment job numbers</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Strategic open space (1 hectare)</li> <li>• Leisure centre (re-provision)</li> <li>• Secondary school</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its dockside location. Specifically, buildings should step down from Canary Wharf to the smaller scale residential properties to the north and south;</li> <li>• protect or enhance the setting of the Maritime Greenwich world heritage site and other surrounding heritage assets;</li> <li>• respect the waterside setting, ensuring public accessibility to the waterfront and active frontages provided with buildings stepped back</li> <li>• maximise the provision of family homes;</li> <li>• improve biodiversity and ecology along the water edges and within open spaces;</li> <li>• improve walking and cycling connections to, from and within the site - specifically to improve connections to Millwall Outer Dock and to Barkentine Estate centre, Westferry Road centre and Crossharbour centre. These routes should align with the existing urban grain to support permeability and legibility. Public open space should be located adjacent to the Millwall Outer Dock and designed to facilitate sport and recreation activities; and</li> <li>• improve public realm with active site edges, specifically along Westferry Road and Millharbour.</li> </ul>	
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>• New development should be well connected to the existing leisure centre at Tiller Road.</li> <li>• Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.</li> </ul>	

Figure 51 :Westferry Printworks



-  Site boundary
-  Open space
-  Public square
-  Waterfront walk
-  Strategic pedestrian/ cycling routes
-  Green grid
-  Local pedestrian/ cycling routes



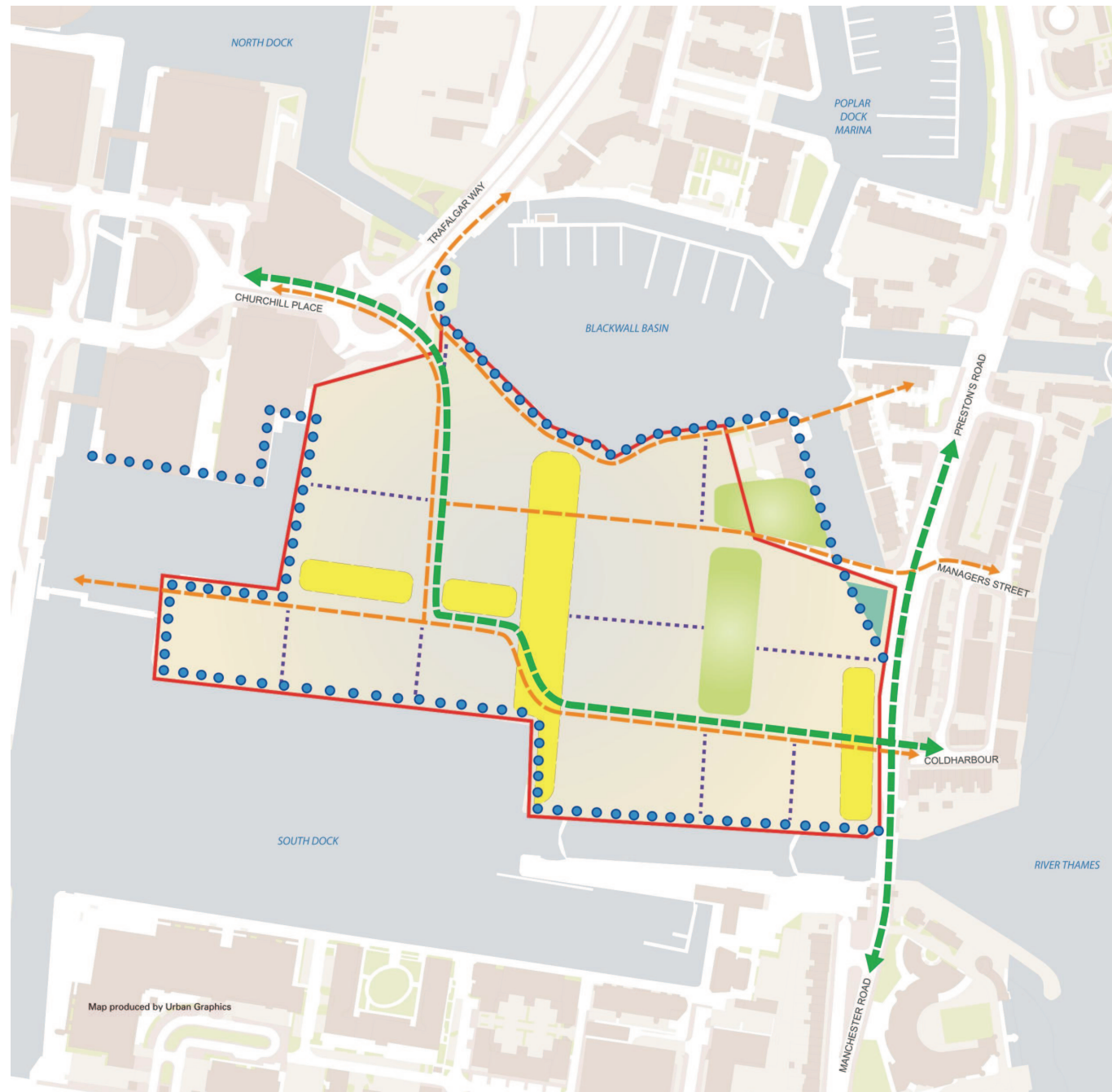
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## Wood Wharf

<b>Address</b>	Prestons Road	
<b>Size (hectares)</b>	7.26	
<b>Public transport accessibility levels</b>	3-5 (2017)	3-6a (by 2021)
<b>Floodzone(s)</b>	2-3a	
<b>Land use requirements</b>	<ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment: comprehensive mixed use development to provide town centre uses including small-to-medium enterprises and large floorplate offices</li> </ul>	
<b>Infrastructure requirements</b>	<ul style="list-style-type: none"> <li>• Strategic open space (1 hectare)</li> <li>• Primary school</li> <li>• Idea store</li> <li>• Health facility</li> </ul>	
<b>Design principles</b>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> <li>• complement the tall building cluster in Canary Wharf through appropriate taller building heights, while respecting and being informed by the existing character, scale, height, massing and urban grain of the surrounding built environment and its dockside location;</li> <li>• focus tall buildings in the western portion of the site, stepping down to the existing lower rise environment in Cubitt Town to the east;</li> <li>• protect or enhance the Blackwall Basin and former West India Dock walls and other surrounding heritage assets;</li> <li>• maximise the creation of family homes;</li> <li>• create new east-west and north-south walking and cycling routes. These should align with the existing grid geometry of Canary Wharf to support permeability and legibility, specifically connecting to Canary Wharf and Marsh Wall East;</li> <li>• provide a range of new publicly accessible open spaces;</li> <li>• integrate the site with the green grid route along Preston's Road; and</li> <li>• present excessive overshadowing and enable activation of the riverside by ensuring building are stepped back the water edge.</li> </ul>	
<b>Delivery considerations</b>	<ul style="list-style-type: none"> <li>• The delivery of an idea store will need to be monitored alongside the development of the Crossharbour town centre site to ensure the needs of communities are met in the most appropriate manner.</li> <li>• Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.</li> </ul>	

Figure 52 :Wood Wharf



Site Allocation 4.13:  
Wood Wharf

KEY

-  Site boundary
-  Open space
-  Public square
-  Enhanced waterspace
-  Waterfront walk
-  Strategic pedestrian/ cycling routes
-  Green grid
-  Local pedestrian/ cycling routes



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Map produced by Urban Graphics



## Chapter 1: Managing development

- 1.1** In order to ensure the Local Plan policies are put into action and sites in the borough are delivered in line with the vision and objectives set out in section 2, we will continue to undertake regular monitoring and adopt the following implementation approaches.
- 1.2** The Local Plan will be the main mechanism through which planning applications are determined.
- 1.3** The broader process of determining planning applications encompasses pre-application discussions, planning performance agreements and the use of tools such as design reviews and sustainability checklists. We will also use special legislative tools (such as article 4 directions) where there is a particular need.
- 1.4** In particular, we consider that inclusive and responsive pre-application engagement is crucial to achieving speedier decisions and better quality developments, and is strongly encouraged. While the outcome of an application cannot be guaranteed, a planning application is more likely to succeed if it is well prepared, accords with the Local Plan and properly addresses/responds to relevant challenges raised at the pre-application stage.
- 1.5** When preparing planning applications, applicants and developers should have regard to the requirements set out in the latest validation checklist, which can be downloaded from our website.
- 1.6** As a priority, we aim to promote a coordinated approach to development through the development management process and negotiations with landowners, developers and other interested parties. Where considered necessary, we have legal powers to compulsorily purchase land to enable development in line with the regeneration aspirations set out in the plan, but this will always be a last resort.
- 1.7** Alongside the policies set out in the Local Plan, we will also take account of supplementary planning documents and other relevant guidance when determining planning applications. These include:
- South Quay Masterplan Supplementary Planning Document (2015).
  - Whitechapel Vision Masterplan Supplementary Planning Document (2013).
  - Fish Island Area Action Plan (2012).
  - Bromley-by-Bow Masterplan (2012).
  - Planning Obligations Supplementary Planning Document (2016).
  - Development Viability Supplementary Planning Document (2017/2018).
- 1.8** Area-specific plans and masterplans are key to realising the vision of the Local Plan and informing the redevelopment of key sites and areas of change. We will continue to develop and use masterplans to influence the design and layout of new development in collaboration with infrastructure providers and other relevant organisations.
- 1.9** Other relevant guidance is prepared at the regional and sub-regional level, including the Mayor of London's supplementary planning guidance which provides further detail to the policies set out in the development plan.
- 1.10** In order to achieve the vision and objectives set out in the Local Plan, there may be a requirement to impose conditions to mitigate any negative impacts arising from development proposals to make them acceptable.
- 1.11** Any conditions that we impose on development proposals will be consistent with relevant guidance, including the National Planning Policy Framework. Planning conditions will only be imposed where they are necessary, relevant to planning and to the development in order to be permitted enforceable, precise and reasonable in all other respects.
- 1.12** We will also consider all matters of planning breaches of planning control that are reported to us. This might involve requesting a retrospective planning application, negotiating changes to the unauthorised development or where necessary formal enforcement action to remedy the breach of control, having regard to government guidance.
- 1.13** We will produce an enforcement plan that will set out in more detail how our compliance and enforcement service will be delivered and how investigations will be prioritised. Further information on enforcement and compliance activity will be published in the annual monitoring report.

## Chapter 2: Partnership working

- 2.1** Central to the delivery of the Local Plan's policies and objectives is working in partnership with our partners, stakeholders, local communities and neighbouring boroughs. This ensures that priorities are aligned and buy-in is secured.
- 2.2** We have prepared a statement of how we intend to involve local community groups, residents, businesses and other stakeholders in the preparation and implementation of our planning policy documents and in the consideration of planning applications<sup>(86)</sup>.
- 2.3** With the highest target for new homes in London, housing delivery is one of the most important challenges facing the borough. Along with the Tower Hamlets Housing Strategy (2016) and Housing Delivery Strategy (2017), we have established several key delivery mechanisms to ensure successful housing delivery across the borough. These include the following.
- The Tower Hamlets Housing Forum – a partnership between ourselves (the council) and housing associations (registered providers). Its purpose is to help deliver the adopted strategy (including the delivery of new affordable homes to meet a range of needs); collaborate on developing good practice; and improve housing, maintenance and development standards.
  - Greater London Authority grant funding – along with registered providers, we can apply for grant funding and support to help facilitate affordable housing delivery.
  - Housing delivery vehicles – we have established two bespoke housing delivery vehicles (Seahorse Homes Limited and Mulberry Housing Society) to expand the range of interventions in the housing market and provide a range of new homes (both market and affordable) that meet the needs of the rapidly growing local population.
- Poplar Riverside Housing Zone - the Mayor of London proposed 'housing zones' as a means of accelerating the delivery of housing within areas of potential. The Poplar Riverside Housing Zone will be the key mechanism to delivering new homes in this part of the borough.
- 2.4** Opportunities will be sought to improve the management and performance of our town centres, with a focus on the evening and night time economy, facilitated through various initiatives, such as working with town centre partnerships and forums.

## Chapter 3: Neighbourhood planning

- 3.1** Neighbourhood planning enables interested local communities to help directly shape and promote development in their area through creating plans and policies. Neighbourhood plans, when adopted, will form part of the development plan (see figure 1) and will be used to help determine planning applications. This is a community-led process which is able to receive technical and administrative support from the council and other bodies.
- 3.2** Neighbourhood planning takes place within designated neighbourhood areas. These are defined by the community and have to be agreed with us before they can be designated. The neighbourhood areas must meet legislative requirements, including that they form a coherent spatial area.
- 3.3** Neighbourhood planning is led by designated neighbourhood forums. These are groups made up of local residents, workers, business-owners and elected members.
- 3.4** There are a number of designated neighbourhood areas in Tower Hamlets with active neighbourhood forums. In some parts of the borough, neighbourhood forums are preparing neighbourhood plans which will provide additional area-specific policies alongside the Local Plan<sup>(87)</sup>.
- 3.5** Neighbourhood plans must be in general conformity with the London Plan and the strategic policies of the Local Plan, although they can allocate sites to deliver housing and other uses and provide additional guidance to address specific neighbourhood issues or identify opportunities for regeneration and priority projects within the neighbourhood area. Appendix 5 sets out which policies within the Local Plan are considered to be strategic for the purposes of neighbourhood planning.

87 Further information on the areas in the borough where neighbourhood planning is taking place can be found from our web site at [www.towerhamlets.co.uk](http://www.towerhamlets.co.uk).



## Chapter 4: Infrastructure delivery

- 4.1** We have been working closely with infrastructure providers, delivery partners and other relevant organisations to ensure that the necessary infrastructure to support planned growth is delivered. The Tower Hamlets Infrastructure Delivery Plan identifies the infrastructure and services that will be required to meet the anticipated growth targets and objectives set out in the Local Plan. It is not an exhaustive list and other items will be required, as appropriate, in response to new development in the borough.
- 4.2** The majority of future infrastructure projects will be financed from monies secured through section 106 agreements and the community infrastructure levy (see below) or equivalent. However, the exploration, identification and use of other funding sources (e.g. grants, subsidies and crowd-funding) will also require us to work with partner organisations and other stakeholders (including Transport for London, Greater London Authority and other government departments) to maximise the monies available to deliver infrastructure projects. Further information about the infrastructure requirements of specific sites and areas where significant development is planned is outlined in section 4.
- 4.3** The community infrastructure levy applies a standard charge to developments, as specified in the charging schedule, and will be used to fund infrastructure needed to support the development of an area: this includes transport, parks, schools, health facilities and leisure centres.
- 4.4** The Mayor of London's community infrastructure levy will be used to raise funds towards major infrastructure projects of strategic importance such as Crossrail 2<sup>(88)</sup>.
- 4.5** Section 106 agreements will be used where the identified pressure from a proposed development cannot be addressed through planning conditions and where any infrastructure requirement (not covered under the community infrastructure levy) relates specifically to that particular development.
- 4.6** The Planning Obligations Supplementary Planning Document provides detailed guidance on the use of the community infrastructure levy and section 106 agreements.

88 For further details about the Mayor of London's community infrastructure levy and the Crossrail Funding Supplementary Planning Guidance, please visit the Greater London Authority's website.

## Chapter 5: Development viability

- 5.1** All planning applications which trigger a requirement to provide affordable housing or where viability is relied upon as a material consideration are required to provide a financial viability assessment.
- 5.2** The Development Viability Supplementary Planning Document will provide guidance on the information requirements for financial viability assessment and the basis on which these will be assessed. The document will help ensure that development viability is treated consistently across the borough.
- 5.3** Relevant policies relating to developer contributions, including the community infrastructure levy, section 106 planning obligations, infrastructure delivery and development viability can be found in section 3 (in particular policies S.SG2 and D.SG4).

## Chapter 6: Monitoring and review

**6.1** Regular monitoring will allow us to assess the impact of changing circumstances on policy effectiveness. This will be crucial in understanding when the need arises to undertake a full or partial update of the Local Plan to ensure it remains consistent with national and regional planning guidance. Some examples of potential triggers include the following.

- Any significant revisions or updates to the London Plan where it proposes different approaches to the delivery of growth within Tower Hamlets.
- Economic downturns – this may restrict the ability of developers or public bodies to provide affordable housing or important contributions towards infrastructure such as open space and may impede the timely delivery of development on our allocated sites.
- Changes in the availability of public funding – this may restrict the delivery of supporting infrastructure or again could prevent some sites from being able to come forward for development at all.
- Technological change such as changes in building methods or the continuing advance of online retailing which will have significant implications for the future of our town centres.
- Any significant changes to national planning policy and guidance.

**6.2** We will continue to measure the extent to which our policies are working and responding to the needs identified in this plan. Each year, we will produce a monitoring report which will:

- assess the performance of the Local Plan policies and other policy documents, as set out in the Local Development Scheme;
- anticipate the impact of trends on the wider social, economic and environmental issues facing the borough to gain an understanding of how the borough is changing in response to the policies set out in this plan;
- monitor the supply of housing and employment against the targets set out in this plan;

- monitor the amount of funds collected from community infrastructure levy and section 106 agreements, or equivalent; and
- monitor the delivery of key infrastructure projects as set out in the Infrastructure Delivery Plan.

**6.3** If regular monitoring indicates that the policies set out in this plan are not being implemented, action will be taken to correct this. This may involve:

- producing supplementary planning documents and other relevant guidance to provide more detail of how policies should be implemented;
- reviewing the mechanisms through which developers fund or contribute towards infrastructure and mitigate the effects arising from development;
- develop further working relationships with various partners across the public, private and voluntary sectors to look at ways to facilitate implementation, including potential alternative forms of funding;
- continue to work with adjoining local authorities and agencies to address cross-boundary development needs;
- extending of existing contracts to ensure waste from our black bins is managed effectively throughout the plan period;
- reviewing capacity forecasts to make sure they reflect up-to-date guidance and any future changes to population and household growth;
- holding discussions with developers and landowners to identify barriers to delivery; and
- reviewing site allocations to make sure there is an adequate supply of new homes, jobs and waste facilities to meet future needs.

**6.4** In the light of the projections set out in appendix 7, we will closely monitor the supply of housing in the borough to explore ways of addressing any shortfall during the plan period.

**6.5** Table 7 below identifies the key monitoring indicators and targets which will be used as a basis for monitoring the effectiveness of the plan policies within the annual monitoring report. All indicators and targets will be subject to periodic review through the monitoring process.

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Table 10 Monitoring and delivery framework

Topic area	Policies	Objectives and principles	Key monitoring indicator	Target (if applicable)
Achieving sustainable growth	<p><b>S.SG1:</b> Areas of growth and opportunity within Tower Hamlets</p> <p><b>S.SG2:</b> Delivering sustainable growth in Tower Hamlets</p> <p><b>D.SG2:</b> Health impact assessments</p> <p><b>D.SG3:</b> Planning and construction of new development</p> <p><b>D.SG4:</b> Developer contributions</p>	<p><b>Key objective 1:</b> All principles</p> <p><b>Key objective 2:</b> All principles</p>	<p><b>KMI 1:</b> Growth in homes and employment within the following sub-areas:</p> <ul style="list-style-type: none"> <li>• City Fringe</li> <li>• Lower Lea Valley</li> <li>• Isle of Dogs and South Poplar</li> <li>• Central Area</li> </ul> <p><b>KMI 2:</b> Breakdown of community infrastructure levy and section 106 monies received and/or negotiated across all topic areas.</p>	See section 4 of the Local Plan
Creating attractive and distinctive places	<p><b>S.DH1:</b> Delivering high quality design</p> <p><b>D.DH2:</b> Attractive streets, spaces and public realm</p> <p><b>S.DH3:</b> Heritage and the historic environment</p> <p><b>D.DH4:</b> Shaping and managing views</p> <p><b>S.DH5:</b> World heritage sites</p> <p><b>D.DH6:</b> Tall buildings</p>	<p><b>Key objective 1:</b> Principles 9, 10, 11</p> <p><b>Key objective 2:</b> Principles 2, 6, 8</p>	<b>KMI 3:</b> Number of designated heritage assets (scheduled ancient monuments, listed buildings registered parks and gardens and conservation areas)	No loss of designated heritage assets
			<b>KMI 4:</b> Percentage of planning appeals upheld due to design	N/A
			<b>KMI 5:</b> Removal of heritage assets at risk from the risk register	Decrease in the number of protected heritage assets 'at risk'
			<b>KMI 6:</b> The number of applications received for mansard roof extensions within conservation areas (focus on Medway and Driffield conservation areas)	N/A

Topic area	Policies	Objectives and principles	Key monitoring indicator	Target (if applicable)
	<p><b>D.DH7:</b> Density</p> <p><b>D.DH8:</b> Amenity</p> <p><b>D.DH9:</b> Shopfronts</p> <p><b>D.D10:</b> Advertisements, hoardings and signage</p> <p><b>D.DH11:</b> Telecommunications</p>			
Meeting housing needs	<p><b>S.H1:</b> Delivering housing</p> <p><b>D.H2:</b> Affordable housing</p> <p><b>D.H3:</b> Housing standards &amp; quality</p> <p><b>D.H4:</b> Specialist housing</p> <p><b>D.H5:</b> Gypsies &amp; travellers accommodation</p> <p><b>D.H6:</b> Student housing</p> <p><b>D.H7:</b> Housing with shared facilities (houses of multiple occupation)</p>	<p><b>Key objective 1:</b> Principles 1, 2, 11, 12</p> <p><b>Key objective 2:</b> Principles 3, 6</p>	<b>KMI 7:</b> Net additional homes in the monitoring year and previous years	3,931 new homes per year
			<b>KMI 8:</b> Five-year housing land supply and fifteen-year housing trajectory	To demonstrate a five-year supply for housing (on a rolling basis) and fifteen-year housing trajectory
			<b>KMI 9:</b> Percentage of new homes that are affordable	50% of all new homes to be affordable <sup>(89)</sup>
			<b>KMI 10:</b> Percentage breakdown of all housing tenures	<p>Of the affordable housing delivered, 70% will be rented housing and 30% will be intermediate housing.</p> <p>Of all market homes delivered, 20% will be family housing (3 or more beds).</p> <p>Of all affordable homes delivered, 45% will be family housing (3 or more beds).</p>

89 The affordable housing target is comprised of: a minimum of 35% affordable housing on private development (of 11 or more units); affordable housing contributions from all small sites; council-led affordable housing initiatives; and registered social landlord schemes.

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Topic area	Policies	Objectives and principles	Key monitoring indicator	Target (if applicable)
			<b>KMI 11:</b> Net additional non-conventional homes (including student beds and specialised housing)	N/A
			<b>KMI 12:</b> Delivery of wheelchair accessible/adaptable homes	10% of all homes delivered
			<b>KMI 13:</b> Gypsy and traveller pitches	No net loss in the number of suitable gypsy and traveller pitches (safeguarded site at Old Willow Close)
Delivering economic growth	<b>S.EMP1:</b> Creating investment and jobs <b>D.EMP2:</b> New employment space <b>D.EMP3:</b> Loss of employment space <b>D.EMP4:</b> Redevelopment within designated employment areas	<b>Key objective 1:</b> Principles 1, 4, 5, 6, 7  <b>Key objective 2:</b> Principles 4, 5, 7	<b>KMI 14:</b> Net additional employment floorspace delivered by type	Work towards meeting the maximum employment projection of 125,000 new jobs through a net increase of: <ul style="list-style-type: none"> <li>1,384,250 square metres of office floorspace</li> <li>110,000 square metres of industrial floorspace</li> </ul>
			<b>KMI 15:</b> Net additional jobs by type	Progression towards the aspirational target of 125,000 additional jobs
			<b>KMI 16:</b> Count of births of new enterprises	N/A
			<b>KMI 17:</b> Gain/loss of floorspace within the following designated employment areas: <ul style="list-style-type: none"> <li>Preferred Office Locations</li> <li>Local Employment Locations</li> <li>Strategic Industrial Locations</li> </ul> Local Industrial Locations	No further loss of employment floorspace
Revitalising our town centres	<b>S.TC1:</b> Supporting the network and hierarchy of centres	<b>Key objective 1:</b> Principles 1, 5, 6, 7, 9	<b>KMI 18:</b> Proportion and number of town centre uses (A1/2/3/4/5, B1, D1 & D2) within all town centres.	Not less than 60% A1 within Primary Frontage and Columbia Road/Redchurch Street Neighbourhood Centres

Topic area	Policies	Objectives and principles	Key monitoring indicator	Target (if applicable)
	<b>D.TC2:</b> Retail in our town centres	<b>Key objective 2:</b> Principles 4, 6, 8		Not less than 40% A1 within Secondary Frontages and all other Neighbourhood Centres
	<b>D.TC3:</b> Retail outside our town centres		<b>KMI 19:</b> Town centre vacancy rates	Decrease from baseline level (2016)
	<b>D.TC4:</b> Financial and professional services		<b>KMI 20:</b> Approvals and completions of additional short-stay accommodation	N/A
	<b>D.TC5:</b> Food, drink, entertainment and the night-time economy		<b>KMI 21:</b> Pitches and vacancy in council-owned public street markets	Increase (or no net loss) in the number of pitches
	<b>D.TC6:</b> Short-stay accommodation			
	<b>D.TC7:</b> Markets			
Supporting community facilities	<b>S.CF1:</b> Supporting community facilities <b>D.CF2:</b> Existing community facilities <b>D.CF3:</b> New and enhanced community facilities <b>D.CF4:</b> Public houses	<b>Key objective 1:</b> Principles 3, 5, 6, 7, 8, 10  <b>Key Objective 2:</b> Principles 4, 6	<b>KMI 22:</b> Applications and permissions for new/loss of D1 and D2 community uses.	Prevent the loss of community facilities and ensure net gain over whole plan period
Enhancing open and water spaces	<b>S.OSW1:</b> Creating a network of open spaces <b>S.OSW2:</b> Creating a network of water spaces	<b>Key objective 1:</b> Principles 3, 6, 8, 9, 10	<b>KMI 23:</b> Area of land designated as open space (loss or gain from previous year)	No loss of public open space sites
			<b>KMI 24:</b> Number of eligible open spaces that have been awarded the Green Flag standard	Increase in the number of parks / open space with Green Flag Award



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Topic area	Policies	Objectives and principles	Key monitoring indicator	Target (if applicable)
	<p><b>D.OSW3:</b> Open space and green grid networks</p> <p><b>D.OWS4:</b> Water spaces</p>	<p><b>Key objective 2:</b> Principles 1, 2, 6, 8</p>		
Protecting and managing our environment	<p><b>S.ES1:</b> Protecting and enhancing our environment</p> <p><b>D.ES2:</b> Air quality</p> <p><b>D.ES3:</b> Urban greening and biodiversity</p> <p><b>D.ES4:</b> Flood risk</p>	<p><b>Key objective 1:</b> Principles 3, 12, 13, 14</p> <p><b>Key objective 2:</b> Principles 2, 8</p>	<p><b>KMI 25:</b> Area of land designated as a Site of Nature Conservation Interest</p>	No net loss of land designated as a Site of Nature Conservation Interest
			<p><b>KMI 26:</b> Number of developments approved against Environment Agency advice in relation to flood risk and water quality grounds</p>	No unresolved Environment Agency objection to development
			<p><b>KMI 27:</b> Carbon dioxide emission reduction</p>	Reduce carbon emissions by 60% by 2025 <sup>(90)</sup>
			<p><b>KMI 28:</b> Concentration of each pollutant at each monitoring station</p>	To meet the limit values for nitrogen dioxide and concentration of PM <sub>10</sub> particulate matter
			<p><b>KMI 29:</b> The number of developments that meet or exceed the air quality neutral standards</p>	All development to meet or exceed the air quality neutral standards
Managing our waste	<p><b>S.MW1:</b> Managing waste</p> <p><b>D.MW2:</b> New and Enhanced waste facilities</p> <p><b>D.MW3:</b> Waste collection facilities in new development</p>	<p><b>Key objective 1:</b> Principles 3, 6, 12, 13, 14</p>	<p><b>KMI 30:</b> Proportion of new and expanded waste management facilities permitted, including their capacity to deal with apportioned waste.</p> <p>Additional land required: between 3.49 and 5.27 hectares.</p>	<p>London Plan apportionment target:</p> <p>2021: 252,000 tonnes</p> <p>2026: 302,000 tonnes</p> <p>2031: 307,000 tonnes</p> <p>2036: 313,000 tonnes</p>

Topic area	Policies	Objectives and principles	Key monitoring indicator	Target (if applicable)
			<b>KMI 31:</b> Household waste recycled, reused and composted (also represented as a household recycling rate)	Local authority collected waste: 50% by 2020 and 100% by 2031 <sup>(91)</sup>
			<b>KMI 32:</b> Recycling, reuse and composting per borough resident	Increase on baseline level (2016)
			<b>KMI 33:</b> Municipal waste sent to landfill and sent to treatment	N/A
Improving connectivity and travel choice	<b>S.TR1:</b> Sustainable travel <b>D.TR2:</b> Impacts on the transport network <b>D.TR3:</b> Parking and permit-free <b>D.TR4:</b> Sustainable delivery and servicing	<b>Key objective 1:</b> Principles 3, 4, 6, 8, 13, 14  <b>Key objective 2:</b> Principles 1, 2, 7, 8	<b>KMI 34:</b> Public satisfaction with public transport	Increase on baseline level (2016)
			<b>KMI 35:</b> Number of on-street car club spaces	Increase on baseline level (2016)
			<b>KMI 36:</b> Total distance of cycle and pedestrian networks	Increase on baseline level (2016)
			<b>KMI 37:</b> Number of Transport for London cycle docking stations in the borough	Increase on baseline level (2016)
			<b>KMI 38:</b> Loss/gain of depots and wharfs	Prevent the loss of depots and wharfs

91 London Plan target (GLA, 2016)

## Appendix 1: Glossary and acronyms

Term	Abbreviation	Explanation
<b>Active frontages</b>		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, 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.
<b>Affordable housing</b>		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.
<b>Amenity space</b>		An area within the curtilage of a residential development that is used for recreation and provides visual amenity, e.g. gardens or landscaped space. This includes both 'private' and 'communal' amenity space.
<b>Annual monitoring report</b>	AMR	Assesses the effectiveness of our policies and proposals
<b>Archaeological Priority Area</b>		A defined area where there is significant known archaeological interest which might be affected by development.
<b>Building Research Establishment Environmental Assessment Method</b>	BREEAM	A widely used method to assess the sustainability of non-residential developments.
<b>Car-free development</b>		Car-free developments do not provide parking for cars on-site and there is no entitlement to on-street parking permits for residents. This exception to this is parking for accessible properties.
<b>Central Activities Zone</b>	CAZ	This zone forms London's "vibrant centre and one of the world's most attractive and competitive business locations" (London Plan, 2016). It contains key areas for employment, retail, leisure, culture, tourism as well as housing.
<b>Clear zone</b>		An integrated area initiative comprising an incremental package of measures to improve air quality and reduce carbon dioxide emissions through lowering motor traffic levels, improving the public realm, together with encouraging a shift to walking, cycling and public transport to make our streets and spaces better and more liveable places.

Term	Abbreviation	Explanation
<b>Community facilities</b>		For the purposes of this Local Plan, community facilities can include: 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.
<b>Community infrastructure levy</b>	CIL	A tariff on development which creates net additional floor space, where the gross internal area of new build exceeds 100 square metres to help fund new infrastructure required to support the development.
<b>Comparison shopping</b>		Retail goods not bought on a frequent basis, such as televisions, fridges and dishwashers etc.
<b>Connectivity</b>		This refers to the number of connections and their integration, layout and relationship to one another and the impact this has on getting from A to B, by foot, bicycle and vehicle..
<b>Convenience shopping</b>		The provision of everyday, essential items, such as food, drink and newspapers.
<b>Crossrail 2</b>		A proposed new north-south central spinal railway running through London.
<b>Development management</b>		Development management is the term used to include the range of activities and interactions that together transform the 'control of development and the use of land' into a more positive and proactive process in keeping with the ethos of spatial planning and supports local authorities in their role as place shapers.
<b>Development management policies</b>		These policies set out detailed criteria to carefully manage and control development through the planning application process.
<b>Development plan</b>		<p>The borough's development plan is comprised of:</p> <ul style="list-style-type: none"> <li>• the London Plan (produced on behalf of the Mayor of London);</li> <li>• the Local Plan (this document); and</li> <li>• any Neighbourhood Plans which may come forward.</li> </ul> <p>The development plan sets out specific policies to guide the use of land and buildings. These policies will be the starting point for assessing planning applications.</p>
<b>District centre</b>		These designations form part of the borough's network of town centres, providing commercial and retail services to predominately serve local communities. They typically have at least one supermarket and a variety of non-retail functions (including community facilities) and are close to the strategic transport network.

Term	Abbreviation	Explanation
<b>District heating facility</b>		A district heating facility provides a supply of heat - generated via sustainable energy sources - to a number of buildings within an area through a system of pre-insulated underground pipes.
<b>Docklands Light Railway</b>	DLR	An automated, driverless light metro system serving the redeveloped Docklands area, including large parts of the borough and adjoining authorities.
<b>Dwelling</b>		Also referred to as a 'residential unit' is a self-contained unit of residential accommodation.
<b>Early years settings</b>		Facilities and services for children of pre-school age (0-4), which include childcare providers, children centres and nurseries.
<b>Easily adaptable</b>		Easily adaptable requires adjustable level kitchen units to be installed to replace the standard units provided; that a level access shower is provided in one bathroom with "wet-room" drainage and that all parts of the dwelling must be suitably sized and that walls are strengthened for the installation of additional mobility aids, as required in the GLA's Housing Supplementary Planning Guidance.
<b>Elizabeth line</b>		A new east-west spinal route through central London and beyond.
<b>Enclosure</b>		Enclosure refers to the design and scale of buildings to create a sense of defined space. Development should create streets and spaces with a degree of enclosure by assisting in defining the edges of the public realm.
<b>Energy opportunity areas</b>		Areas of new development where more energy efficient solutions can be applied by considering potential sites together. It is in these areas that the principles of Mayor of London's Energy Action Areas will be best applied.
<b>Evening and night-time economy</b>		Uses and activities including bars, cafes, nightclubs, restaurants and leisure activities which provide opportunities for people to enjoy and socialise in the evening and night time.
<b>Family housing</b>		Houses and flats which contain three or more bedrooms.
<b>Flood risk zone</b>		Areas within the borough which are at risk from flooding. The flood risk zones consist of zones 1, 2 and 3a and 3b (the higher the number the greater the risk of flooding) and are based on the Environment Agency's flood map for England and Wales.
<b>Gated communities</b>		Walled or fenced housing developments to which public access is restricted, often guarded using CCTV and/or security personnel.

Term	Abbreviation	Explanation
<b>Greater London Authority</b>	GLA	A top-tier administrative body covering the Greater London area. It is comprised of two parts: the London Assembly and the Mayor of London as defined under legislation. The London Assembly scrutinises the activities of the Mayor of London in the public interest.
<b>Green grid</b>		A network of inter-linked high quality and multi-functional open spaces, waterways and other corridors.
<b>Hamlets</b>		This refers to the 24 places (see figure 4) consisting of historic as well as more recently established places within Tower Hamlets
<b>Health facilities</b>		For the purposes of the Local Plan, health facilities can include hospitals, walk-in-centres, doctors surgeries, health and wellbeing centres and community health services.
<b>Historic Environment Record</b>		Information services which provide access to details on historic assets and landscapes
<b>Home Quality Mark</b>		The Home Quality Mark is a design and construction standard that house builders can apply to demonstrate the quality of their homes in the absence of the Code for Sustainable Homes.
<b>Housing Strategy</b>		This sets out our approach to delivering the housing aspects of the Community Plan.
<b>Housing zone</b>		An initiative of the Mayor of London to accelerate new housing development in specific areas of London, including Poplar Riverside in Tower Hamlets.
<b>Human scale</b>		The size and scale of buildings and structures which relate well in size to an individual human being and arranged in a way which makes people feel comfortable rather than overwhelmed.
<b>Idea stores</b>		These provide traditional library services as well as additional services including IT facilities and places for socialising as well as access to lifelong learning courses.
<b>Infill development</b>		Development that takes place on vacant or undeveloped site between other developments and/or built form.
<b>Infrastructure</b>		Services which are necessary for the day-to-day functions of the community and economy such as roads, railways and social/community facilities. Infrastructure includes utility services, transport routes, schools, open space and health and leisure services.
<b>Infrastructure Delivery Plan</b>	IDP	An assessment of the existing and future infrastructure needs and requirements to support new development and the borough's growing population.

Term	Abbreviation	Explanation
<b>Integrated Impact Assessment</b>	IIA	As part of developing Tower Hamlet’s Local Plan all policies have been subject to an IIA. The IIA comprises: Sustainability Appraisal, Health Impact Assessment, Equalities Impact Assessment and Habitat Regulation Assessment.
<b>Intrusive elements</b>		Elements harmful for the designated view for example through: obscuring the landmark or protected skyline, adversely affecting the prominence of the landmark by scale and/or proximity including coalescence and visual dominance.
<b>Intermediate housing</b>		Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent.
<b>Large floor plate offices</b>		An office typology that requires large floor plates.
<b>Legibility</b>		The degree to which a place can be easily understood and moved around in.
<b>Leisure facilities</b>		For the purposes of the Local Plan, leisure facilities can include leisure centres, indoor and outdoor sports facilities and swimming pools.
<b>Local Development Scheme</b>	LDS	A project plan setting out how the Local Plan and other relevant documents (e.g. supplementary planning documents) will be prepared and when.
<b>Local Employment Location</b>	LEL	LELs have unique individual characteristics. They are areas of high accessibility that provide or could provide significant capacity for employment accommodation meeting secondary, more local or specialist employment needs, and to support the needs of start-ups, small and medium enterprises and creative and digital industries.
<b>Local Industrial Location</b>	LIL	An area or site identified as being important to local employment and required for the reservoir of industrial employment land, to be safeguarded for industrial employment uses.
<b>Local landmarks</b>		A locally well-known and recognised building or structure that stands out from its background by virtue of height, size or some other aspect of design.
<b>Local presence facility</b>		An accessible and integrated facility merging services currently provided within one-stop-shops and idea stores providing customers with the ability to access and interact with council services in different ways alongside a range of complementary activities, such as arts, leisure and learning/information services.



Term	Abbreviation	Explanation
<b>Local shop</b>		Local shops are not located within a town centre. These shops serve a local retail need and play an important social role in the community as well as contributing to the character and function of the local area.
<b>Local views</b>		A local line of sight from a particular point to an important local landmark, view or skyline.
<b>Locally listed buildings</b>		These are buildings of historic or architectural interest at the local level. Although they are not legally protected, in general, close scrutiny will be given to any development affecting them.
<b>London Legacy Development Corporation</b>	LLDC	The LLDC became the planning authority for the Olympic Legacy area following the Olympic Games in 2012. The north-east area of Tower Hamlets (Hackney Wick/Fish Island and Bromley-by-Bow) was transferred to LLDC in terms of planning responsibilities. Nevertheless, Tower Hamlets continues to provide other services and responsibilities, such as the allocation of affordable housing and provision of school places.
<b>London Plan</b>		The London Plan is the spatial development strategy for all of London. It is prepared by the Greater London Authority. In London, Local Plans must be in general conformity with the London Plan.
<b>Major centre</b>		Canary Wharf has been identified as the only major centre within the borough because it has over 50,000 square metres of retail space, serves a borough-wide catchment, has a combined residential and employment density (in its catchment) in excess of other centres in the borough and contains a variety of functions and services, including a growing leisure economy.
<b>Major developments</b>		In the context of the Local Plan, major developments are defined as: <ul style="list-style-type: none"> <li>• 10 to 100 residential units;</li> <li>• 1,000 to 10,000 square metres floorspace; and</li> </ul> development on a site of more than 0.5 hectare.
<b>Movement hierarchy</b>		The hierarchy of roads, streets and other movement routes that shape how people move around.
<b>National Planning Policy Framework</b>	NPPF	The National Planning Policy Framework sets out the government's planning policies for England.

Term	Abbreviation	Explanation
<b>National Planning Practice Guidance</b>	NPPG	Online resource giving up-to-date government planning guidance and requirements.
<b>Neighbourhood Centre</b>		Neighbourhood centres contain a number of shops including a range of essential uses such as a pharmacy, post office or 'corner shop'. These town centres serve a very local catchment (in the region of a ten minute walking radius) and are located within walking distance to public transport facilities and a strategic road network.
<b>Neighbourhood Plan</b>		Neighbourhood plans give neighbourhood forums direct power to plan for the areas in which they live. These must be in conformity with the strategic priorities of the Local Plan, London Plan and national guidance and should not promote less development than set out in the Local Plan nor undermine its strategic policies. An adopted plan will form a part of the statutory development plan and will be used to inform planning applications within this area.
<b>Neighbourhood planning</b>		Neighbourhood planning gives communities the ability to create planning documents and development orders: Neighbourhood Plans and Neighbourhood Development Orders.
<b>Open space (wider definition of open space)</b>		All land that offers opportunity for play, recreation and sport or is of amenity value, whether in public or private ownership, and where public access is unrestricted, partially-restricted or restricted. This includes all open areas consisting of: major parks (e.g. Victoria Park and Mile End Park), local parks, gardens, local parks, squares, playgrounds, ecological spaces, housing amenity land, playing fields (including playing pitches), allotments and burial grounds, whether or not they are accessible to the public. This definition does not include water bodies.
<b>Open space (publically accessible)</b>		Open space will be considered to be publicly accessible, where access for the public is secured by virtue of legal agreements and formal arrangement; whether it is in public or private ownership. Publicly accessible open space will not include areas of water such as rivers, canals, lakes, docks or incidental spaces.
<b>Opportunity areas</b>		The London Plan identifies a number of opportunity areas; this includes the City Fringe/Tech City, Isle of Dogs and South Poplar and Lower Lea Valley in Tower Hamlets. These areas have the ability to accommodate high levels of growth, focusing on housing.
<b>Parking stress</b>		The availability of parking spaces in an area.
<b>Permeability</b>		The degree to which an area has a variety of pleasant, convenient and safe routes through it and the capacity to which those routes can enable the movement of pedestrians, cyclists and vehicles.

Term	Abbreviation	Explanation
<b>Permit-free</b>		Permit-free development may contain some parking on-site, in accordance with the parking standards set out in appendix 3. However, residents are not entitled to on-street parking permits: permit-free developments will need to provide some spaces for disabled residents and for servicing in line with the parking standards.
<b>Place-making</b>		A process which promotes bringing all those involved in shaping the quality of their place together in an inclusive and multi-dimensional manner, in order to create sustainable communities and great places. Place-making capitalises on a local community's assets, inspiration, and potential, ultimately creating places that people feel proud of and have a stake in.
<b>Planning obligation</b>		A legal agreement between the developer, local authority and other interested parties primarily intended to make acceptable those developments that would otherwise be unacceptable in planning terms.
<b>Planning Policy for Traveller Sites</b>		This sets out the government's planning policy for traveller sites.
<b>Policies Map</b>		A part of the Local Plan illustrating the policies set showing the location of proposals on an Ordnance Survey base map.
<b>Preferred Office Location</b>	POL	Area with major office development as the focus, with supporting uses such as gyms, hotels, restaurants and retail uses helping to achieve a sustainable office environment.
<b>Primary &amp; Secondary Frontages</b>		Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.
<b>Private rented sector</b>		All non-owner occupied self-contained dwellings that are being rented out as housing (not including forms of affordable housing).
<b>Public Transport Accessibility Level</b>	PTAL	A measure which rates locations by distance from frequent public transport services (from 0 to 6a, where a score of 0 is very poor and 6a is excellent)
<b>Public realm</b>		The space between and surrounding buildings and open spaces that are accessible to the public and include streets, pedestrianised areas, squares, river frontages.
<b>Referable development</b>		PIPlanning applications of strategic importance to London are referred to the Mayor of London. In Tower Hamlets, this applies to:

Term	Abbreviation	Explanation
		<ul style="list-style-type: none"> <li>developments of 150 residential units or more;</li> <li>developments over 30 metres in height; and</li> </ul> <p>development on Metropolitan Open Land.</p>
<b>Regulation 123 List</b>		A list of the types of infrastructure that will be funded in whole or in part through the community infrastructure levy.
<b>Short stay accommodation</b>		Short stay accommodation is defined as hotels, apart-hotels, serviced apartments and hostels.
<b>Site allocation</b>		A parcel of land which has been set aside in the plan to accommodate strategic housing developments (i.e. sites that can provide over 500 new net-additional homes) and other uses such as employment and retail space. These sites are expected to deliver significant infrastructure with capacity to accommodate future growth and development.
<b>Sites of Importance for Nature Conservation</b>	SINC	Locally defined non-statutory sites of wildlife and geological importance
<b>Small-and-medium-sized enterprises</b>	SME	A category of businesses that employs overall a total of no more than 250 people.
<b>Spatial policies</b>		High-level, overarching policies to help guide development and the use of land throughout the borough.
<b>Specialist housing</b>		Specialist housing refers to supported housing such as sheltered housing, residential care homes, nursing homes and dual-registered care homes.
<b>Statement of Community Involvement</b>	SCI	This sets out how and when we will consult with local and statutory stakeholders in preparing, altering and reviewing development plan documents and supplementary planning documents.
<b>Strategic development</b>		Proposals involving 100 homes or 10,000 square metres of floorspace.
<b>Strategic Industrial Location</b>	SIL	This designation seeks to ensure that there are sufficient sites, in appropriate locations, to meet the needs of the general business, industrial, warehousing, waste management and some utilities and transport sectors.

Term	Abbreviation	Explanation
<b>Strategic Housing Land Availability Assessment</b>	SHLAA	An assessment which identifies a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period.
<b>Strategic Housing Market Assessment</b>	SHMA	This sets out estimates of the borough's current and future housing requirements.
<b>Strategic objective</b>		These objectives define the Local Plan's aspirations to deliver the overall vision set out in section 2.
<b>Streetscape</b>		The appearance of the street as a whole incorporating the road, kerb and gutter, verges, fences, trees and building frontages.
<b>Supplementary Planning Document</b>	SPD	A document which helps explain how policies and proposals in the plan will be applied and implemented.
<b>Supplementary guidance</b>	SPG	A document which the Mayor of London produces to provide further detail on the policies set out in the borough's development plan.
<b>Sustainability Appraisal</b>	SA	A legal assessment of the social, economic and environmental effects of relevant plans and programmes. This tool is used alongside the Strategic Environmental Assessment, Health Impact Assessment, Habitats Regulations Assessment and Equalities Impact Assessment to appraise impacts on specific groups or characteristics.
<b>Sustainable community</b>		A place or neighbourhood where people have a decent and affordable home to live in and have good access to jobs and services, such as schools, open space and shops, in a safe, inclusive and attractive environment, with opportunities to engage in social and community-based activities, preferably without the need to use a car.
<b>Tall buildings</b>		Any building that is significantly taller than their surroundings and/or have a significant impact on the skyline.
<b>Tall Building Zone</b>		Areas identified as being suitable for tall building clusters
<b>Tower Hamlets Community Plan</b>		This sets out the long-term vision for the borough, articulating local aspirations, needs and priorities..
<b>Town centre</b>		A defined area (as shown on the Policies Map) which comprises a broad range of facilities and services, often serving as a focal point for the local community/neighbourhoods.

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Term	Abbreviation	Explanation
<b>Town centre hierarchy</b>		This sets out what role and function different town centres in the borough perform in relation to each other and across London. It includes: the borough's Central Activities Zone, Tower Hamlets Activity Areas, Canary Wharf (Major Centre) and a series of District Centres and Neighbouring Centres.
<b>Transport interchange</b>		Areas centred around transport interchanges which require improvements to the local public realm, connections and way-finding.
<b>Urban grain</b>		The pattern and arrangement of streets, buildings and other features within an urban area.
<b>Vertical and horizontal stacking</b>		Arrangement of a building's floor space and land use either horizontally or vertically, where the building is arranged in a number of levels.
<b>Waste apportionment</b>		The amount of London's waste that each borough is required to manage to ensure London is self-sufficient in managing its municipal, commercial and industrial waste that it produces. This requires an amount of land to be safeguarded within the borough.
<b>Water space</b>		An area of water (permanently or intermittently) and the adjacent land, and includes rivers, canals, docks, basins, ponds, marshland and other water bodies.
<b>Windfall site</b>		Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.

## Appendix 2: Links to the Core Strategy & Managing Development Document

2.1 The table below outlines where the policies from the Core Strategy (2010) and Managing Development Document (2013) have been addressed in this Local Plan.

Core Strategy policy reference	Core Strategy policy title	Local Plan title	Local Plan policy reference
<b>SP01</b>	Refocusing on our town centres	Supporting the network and hierarchy of centres	<b>S.TC1</b>
<b>SP02</b>	Urban living for everyone	Meeting housing needs	<b>S.H1</b>
		Affordable housing	<b>D.H2</b>
		Housing standards and quality	<b>D.H3</b>
		Specialist housing	<b>D.H4</b>
		Gypsies & travellers accommodation	<b>D.H5</b>
		Student housing	<b>D.H6</b>
<b>SP03</b>	Creating healthy and liveable neighbourhoods	Food, drink, entertainment and the night-time Economy	<b>D.TC5</b>
		Creating a network of open spaces	<b>S.OWS1</b>
		Supporting community facilities	<b>S.CF1</b>
		Air quality	<b>D.ES2</b>
		Noise	<b>D.ES8</b>
<b>SP04</b>	Creating a green and blue grid	Creating a network of open spaces	<b>S.OWS1</b>
		Enhancing the network of water spaces	<b>S.OWS2</b>
		Urban greening and biodiversity	<b>D.ES3</b>
		Sustainable drainage	<b>D.ES5</b>



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Core Strategy policy reference	Core Strategy policy title	Local Plan title	Local Plan policy reference
		Flood risk	<b>D.ES6</b>
<b>SP05</b>	Dealing with waste	Managing our waste	<b>S.MW1</b>
		New and enhanced waste	<b>D.MW2</b>
		Waste collection facilities in new development	<b>D.MW3</b>
<b>SP06</b>	Delivering successful employment hubs	Creating Investment and jobs	<b>S.EMP1</b>
		New employment space	<b>D.EMP2</b>
		Short-stay accommodation	<b>D.TC6</b>
<b>SP07</b>	Improving education and skills	Supporting community facilities	<b>S.CF1</b>
		Existing community facilities	<b>D.CF2</b>
		New and enhanced community facilities	<b>D.CF3</b>
<b>SP08</b>	Making connected places	Sustainable travel	<b>S.TR1</b>
		Sustainable delivery and servicing	<b>D.TR4</b>
<b>SP09</b>	Creating attractive and safe streets and spaces	Attractive streets, spaces and public realm	<b>S.DH2</b>
		Parking and permit-free	<b>D.TR3</b>
<b>SP10</b>	Creating distinct and durable places	Heritage and the historic environment	<b>S.DH3</b>
		Delivering high quality design	<b>S.DH1</b>
<b>SP11</b>	Working towards a zero-carbon borough	Protecting and enhancing our environment	<b>S.ES1</b>
<b>SP12</b>	Delivering placemaking	Areas of growth and opportunity within Tower Hamlets	<b>SG1</b>
<b>SP13</b>	Delivering and monitoring	Developer contributions	<b>D.SG5</b>

Managing Development Document policy reference	Managing Development Document title	Local Plan title	Local Plan policy reference
<b>DM0</b>	Delivering sustainable development	Areas of growth and opportunity within Tower Hamlets	<b>S.SG1</b>
		Delivering sustainable growth in Tower Hamlets	<b>S.SG2</b>
<b>DM1</b>	Development within the town centre hierarchy	Supporting the network and hierarchy of centres	<b>S.TC1</b>
		Retail in our town centres	<b>D.TC2</b>
		Food, drink, entertainment and the night-time economy	<b>D.TC5</b>
<b>DM2</b>	Local Shops	Retail outside of our town centres	<b>D.TC3</b>
<b>DM3</b>	Delivering Homes	Affordable housing	<b>D.H2</b>
<b>DM4</b>	Housing standards and amenity space	Housing standards & quality	<b>D.H3</b>
<b>DM5</b>	Specialist Housing	Specialist housing	<b>D.H4</b>
<b>DM6</b>	Student accommodation	Student housing	<b>D.H6</b>
<b>DM7</b>	Short-stay Accommodation	Short-stay accommodation	<b>D.TC6</b>
<b>DM8</b>	Community infrastructure	Supporting community facilities	<b>S.CF1</b>
		Existing community facilities	<b>D.CF2</b>
<b>DM9</b>	Improving Air Quality	Air quality	<b>D.ES2</b>
<b>DM10</b>	Delivering Open Space	Open space and green grid networks	<b>D.OWS3</b>
		Water spaces	<b>D.OWS4</b>
<b>DM11</b>	Living buildings and biodiversity	Urban greening and biodiversity	<b>D.ES3</b>
<b>DM12</b>	Water Spaces	Water spaces	<b>D.WS4</b>
<b>DM13</b>	Sustainable Drainage	Sustainable drainage	<b>D.ES5</b>

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Managing Development Document policy reference	Managing Development Document title	Local Plan title	Local Plan policy reference
<b>DM14</b>	Managing Waste	Managing waste	<b>S.MW1</b>
		Waste collection facilities in new development	<b>D.MW3</b>
<b>DM15</b>	Local job creation and investment	Creating investment and jobs	<b>S.EMP1</b>
		New employment space	<b>D.EMP2</b>
		Loss of employment space	<b>D. EMP3</b>
		Redevelopment within the borough’s employment areas	<b>D.EMP4</b>
<b>DM16</b>	Office locations	Creating investment and jobs	<b>S.EMP1</b>
		Loss of employment space	<b>D.EMP3</b>
		Redevelopment within the borough’s employment areas	<b>D.EMP4</b>
<b>DM17</b>	Local Industrial Locations	Creating investment and jobs	<b>S.EMP1</b>
		Loss of employment space	<b>D.EMP3</b>
		Redevelopment within the borough’s employment areas	<b>D.EMP4</b>
<b>DM18</b>	Delivering schools and early learning	Supporting community facilities	<b>S.CF1</b>
<b>DM19</b>	Further and higher education	New and enhanced community facilities	<b>D.CF3</b>
<b>DM20</b>	Supporting a sustainable transport network	Sustainable travel	<b>S.TR1</b>
		Impacts on the transport network	<b>D.TR2</b>
<b>DM21</b>	Sustainable transportation of freight	Sustainable delivery and servicing	<b>D.TR4</b>
<b>DM22</b>	Parking	Parking and permit-free	<b>D.TR3</b>
<b>DM23</b>	Streets and the public realm	Attractive streets, spaces and public realm	<b>D.DH2</b>

Managing Development Document policy reference	Managing Development Document title	Local Plan title	Local Plan policy reference
		Shopfronts	<b>D.DH9</b>
		Advertisements, signage and hoardings	<b>D.DH10</b>
		Telecommunications	<b>D.DH11</b>
<b>DM24</b>	Place-sensitive design	Delivering high quality design	<b>S.DH1</b>
<b>DM25</b>	Amenity	Amenity	<b>D.DH8</b>
<b>DM26</b>	Building heights	Tall buildings	<b>D.DH6</b>
<b>DM27</b>	Heritage and the historic environment	Heritage and the historic environment	<b>S.DH3</b>
<b>DM28</b>	World heritage sites	World heritage sites	<b>D.DH5</b>
<b>DM29</b>	Achieving a zero carbon borough and addressing climate change	Zero carbon borough	<b>D.ES6 or 7</b>
<b>DM30</b>	Contaminated land and development and storage of hazardous substances	Contaminated land and hazardous substances	<b>D.ES7 or 8</b>

Tower Hamlets Local Plan 2031 (Regulation 19)

**Appendix 3: Parking standards**

Use class	Maximum car* / motorcycle parking**	Minimum long-stay cycle parking (minimum 2 spaces)	Minimum short-stay cycle parking	Other parking
<b>A1: Retail uses</b>				
Shops (non-food/non-warehouse)	No car parking	from a threshold of 100 sqm: first 1000 sqm: 1 space per 250 sqm thereafter: 1 space per 1000 sqm	from a threshold of 100 sqm: first 1000 sqm: 1 space per 125 sqm thereafter: 1 space per 1000 sqm	
Smaller food store (up to 500sq m gfa)	No car parking	from a threshold of 100 sqm: 1 space per 175 sqm	from a threshold of 100 sqm: first 750 sqm: 1 space per 40 sqm; thereafter: 1 space per 300 sqm	
Food supermarket (over 500 sq m)	No car parking unless a transport assessment can demonstrate that walking, cycling, public transport and home delivery cannot cater for demand, that there are not unacceptable impacts on the highway network and a travel plan can be secured.	from a threshold of 100 sqm: 1 space per 175 sqm	from a threshold of 100 sqm: first 750 sqm: 1 space per 40 sqm; thereafter: 1 space per 300 sqm	Service parking is required above 1000sqm and a servicing agreement must be agreed as part of a deliveries and servicing plan.
<b>A2: Financial and professional services</b>				
Financial & professional services	No car parking	from a threshold of 100 sqm: 1 space per 175 sqm	from a threshold of 100 sqm: 1 space per 40 sqm	Service parking is required above 1000sqm and a servicing agreement must be agreed as part of a deliveries and servicing plan.
<b>A3- A5: Restaurants, cafes and drinking establishments</b>				

Use class	Maximum car* / motorcycle parking**	Minimum long-stay cycle parking (minimum 2 spaces)	Minimum short-stay cycle parking	Other parking
Restaurants & cafes (A3)	No parking	from a threshold of 100 sqm: 1 space per 175 sqm	from a threshold of 100 sqm: 1 space per 40 sqm	Service parking is required above 1000sqm and a servicing agreement must be agreed as part of a deliveries and servicing plan.
Drinking establishments (A4)				
Hot-food-takeaways (A5)				
<b>B1: Business uses</b>				
Business offices (B1a)	1/1500 sq m	1/90 sqm	first 5,000 sqm: 1 space per 500 sqm thereafter: 1 space per 5,000 sqm	Service parking is required above 1250 sq m and a servicing agreement must be agreed as part of a deliveries and servicing plan.
B1b, B1c	1 space per 1250 sq m gfa (commercial vehicles only)	1/250 sqm	1/1,000 sqm	Service parking is required above 1250 sq m and a servicing agreement must be agreed as part of a deliveries and servicing plan.
<b>B2: General industrial</b>				
Industrial	1 space per 1250 sqm gfa (commercial vehicles only)	1/250 sqm	1/1000 sqm	Service parking is required above 1250 sq m and a servicing agreement must be agreed as part of a deliveries and servicing plan.
<b>B8: Storage &amp; distribution</b>				
B8: storage & distribution	1 space per 1250 (commercial vehicles only) sqm gfa	1/250 sqm	1/1000 sqm	1 lorry/ HGV space per 1250m2 gfa with additional lorry/ HGV spaces based on a transport assessment.

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Use class	Maximum car* / motorcycle parking**	Minimum long-stay cycle parking (minimum 2 spaces)	Minimum short-stay cycle parking	Other parking
<b>C1 Hotels</b>				
Hotels/hotel suites	On-site provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches and deliveries/servicing.	1/20 bedrooms	1/50 bedrooms	1 coach space/50 bedrooms
<b>C2 Residential institutions</b>				
Hospitals	Spaces will be considered provided they are supported by a transport assessment and the need for patients to be accompanied and for patients and visitors to hours will be considered.	1/5 staff	1/30 staff	Transport assessment is required to justify the need of other parking, i.e. service vehicles taxi pick-up/ set-down bay adequate for 2 required for hospitals.
Cares home / secure accommodation	As above	1/5 staff	1/20 bedrooms	Taxi pick-up/ set down bay adequate for 2 taxis required for accommodation over 100 beds.
Student housing	No parking	1/1 student	1/40 beds	
Residential education/training centre	No parking	1/5 staff	1/10 staff	
<b>C3: Dwelling houses</b>				



Use class	Maximum car* / motorcycle parking**	Minimum long-stay cycle parking (minimum 2 spaces)	Minimum short-stay cycle parking	Other parking
Residential	See table A1  20% active provision plus 20% passive provision for electric vehicle charging facilities must be provided in accordance with the London Plan.	1 space per studio and 1 bedroom unit  2 spaces per all other dwellings	1/40 units	No additional provision for visitor parking, which will be on-street pay and display, or by qualifying for resident visitor temporary permits.  Developers will be encouraged to provide on-site car club bays where appropriate in place of individual car parking spaces.
<b>D1: Non-residential institutions</b>				
Clinics and health centres	Spaces will be considered provided they are supported by a transport assessment and a travel plan can be secured.	1/5 staff	1/3 staff	A transport assessment is required to justify the need of other parking i.e. service vehicles taxi pick-up/set-down bay adequate for two vehicles required for clinics or health centres over 2000 sqm. The need for patients to be accompanied and for patients and visitors to attend at anti-social hours will be considered.
Art galleries and exhibition halls	No parking	1/8 staff	1/100 sqm	
Schools	No parking	1/8 staff + 1/8 students	1/100 students	A transport assessment is required to justify the need of other parking, i.e. service vehicles
Further education colleges and universities	No parking	1/4 staff + 1/8 FTE students	1/7 FTE	A transport assessment is required to justify the need of other parking, i.e. service vehicles
Non-residential training centres	No parking	1/8 staff	1/100 sqm	

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Use class	Maximum car* / motorcycle parking**	Minimum long-stay cycle parking (minimum 2 spaces)	Minimum short-stay cycle parking	Other parking
Creche and day nurseries	No parking	1/8 staff	1/100 students	
Museums	No parking	1/8 staff	1/100 sqm	
Public libraries	No parking	1/8 staff	1/100 sqm	
Places of worship	No parking	1/8 staff	1/100 sqm	
<b>D2: Assembly &amp; leisure</b>				
Cinemas	No parking	1/8 staff	1/30 seats for visitors	
Bingo hall	No parking	1/8 staff	1/30 seats for visitors	
Leisure centres / sports facilities	No parking	1/8 staff	1/100 sqm	
Dance hall	No parking	1/8 staff	1/30 seats for visitors	
Skating rink	No parking	1/8 staff	1/30 seats for visitors	
<b>Sui generis uses</b>				
Parking provision for uses considered to be sui generis will be considered on a case-by-case basis.				

\* 20% active provision plus 20% passive provision for electric vehicles charging facilities must be provided in accordance with the London Plan

\*\* Motorcycle parking standard

3.1 We would welcome the provision of motorcycle parking as a substitute for car parking. Motorcycle parking may be provided within the space allowed by the maximum standards, at a guideline rate of five motorcycle spaces in place of each permitted car parking space. Where no car parking provision is allowed, motorcycle parking spaces will only be considered if supported and justified by a transport assessment.

Accessible car parking - minimum requirements for parking for disabled people

Parking for disabled people should comply with standards in the London Plan with necessary provision made on-site. Where site constraints mean provision is unfeasible or not safe, development will be required to demonstrate how a disabled person can park to use the development with ease.

Residential parking standards

Location	Less than 3 bedroom unit	3 bedroom plus units
Isle of Dogs	0	0.1
PTAL: 5-6	0	0.1
PTAL: 3&4	0.2	0.3
PTAL: 1&2	0.4	0.5

3.2 Further information on how to apply above residential parking standards can be found in the supporting text to policy TR3: Parking and Permit-free.

## Appendix 4: Waste collection standards

### Residential refuse and recycling provision

**4.1** Under the Environmental Protection Act (1990), we have a legal duty to collect waste from households. We currently provide a weekly collection of refuse, recyclables from all properties and a weekly collection of organics from street level properties. All dwellings, individual and multi-occupancy must have sufficient storage capacity to store all materials for a minimum of eight days-worth of waste as detailed in the table below.

Waste capacity guidelines

Number of bedrooms	Suggested capacity per week (litres)			
	Refuse	Dry recyclables	Compostable waste	
			Without garden waste	With garden waste
<b>1</b>	<b>70</b>	<b>60</b>	<b>23</b>	<b>100</b>
<b>2</b>	<b>120</b>	<b>90</b>	<b>23</b>	<b>100</b>
<b>3</b>	<b>165</b>	<b>120</b>	<b>23</b>	<b>200</b>
<b>4</b>	<b>215</b>	<b>150</b>	<b>23</b>	<b>200</b>

### Internal storage requirements

**4.2** Residents will be responsible for providing their own internal containers. Developers are encouraged to install internal containers within individual units for future occupants. All new properties should have sufficient space (preferably in the kitchen area of each property) for residents to be able to separate out waste into three different containers (recyclable, non-recyclable and food waste).

### Waste collection systems for residential properties

**4.3** In exceptional circumstances where we consider that traditional wheeled and Euro bins are appropriate, the developer should contact the Council’s team that manages waste to obtain the latest bin specifications. We have no statutory duty to supply containers for the storage of waste. It is the responsibility of the managing agent/landlord to provide collection containers for all waste streams and ensure waste is stored in a suitable container away from the highway as it is not permitted for bins to be placed on the highway. All waste containers should conform to the most up to date British Standards.

**4.4** Applicants should note that part H6 of the building regulations makes it a requirement for a resident not to carry waste for more than 30 metres from the front door of the development. It is recommended that residents have access to the waste collection area from within the block or development and not have to access the area via the public highway or any type of road even if the distance is less than 30 metres.

**4.5** All waste collection systems and bin stores should have construction security, ventilation and cleansing provisions designed in accordance with the most up-to-date British Standard or equivalent replacement document. Similarly, suitable precautions should be provided to mitigate the fire risk (e.g. sprinklers, fire extinguishers and smoke detection equipment).

### Multi occupancy properties

**4.6** In the case of all multi-unit developments, we advise you to undertake pre-application consultation to explore alternative waste storage methods to help reduce the impact on the local environment. All proposals must be discussed on an individual basis and will be subject to agreement with our team that manages waste.

**4.7** Where a bin storage area is considered appropriate it must be within 10 metres wheeling distance of the collection point. The paths between the storage facility and the collection point must be a minimum width of 1.5 metres, be free from obstructions and steps, have a solid foundation and be suitably paved with a smooth continuous finish. The ground should be level and not have a gradient more than 1:12, towards the

vehicle. A dropped kerb is also required to wheel the bins. The bin stores must be designed so that the waste collection operatives are able to access the waste storage area without entering the building and there should only be one entry/exit to the bin store area. Enclosed bin stores must have internal lighting and there must be enough space and a wide enough doorway for an operative to easily manoeuvre the containers in and out. The dimensions (in metres and cubic metres) of the bins must be included with the application.

- 4.8** It is the responsibility of the managing agent/landlord to ensure that all bins are correctly presented and easily accessible for collection.
- 4.9** Bin stores must be fitted with standard FB1 or FB2 fire brigade locks or incorporate door codes, and the developer should liaise with our team that manages the collection of waste about the key or code arrangements. Once operational, the managing agent/landlord will be required to provide access for collection crews as required.
- 4.10** Where access is required across a public highway, suitable drop kerb crossovers should be provided. Where parking spaces are in existence, arrangements should be made with us to enable a bin with dimensions of 1700 x 1200mm to be wheeled between the parked vehicles.
- 4.11** Doors to bin stores where collections are directly off the highway should either have sliding doors or doors opening inwards. This is to ensure that the highway is not obstructed. All doors should have stays or catches to avoid collection crews having to open the doors on multiple occasions.
- 4.12** We prefer collection of waste from ground floor level and any property that proposes storage elsewhere should make arrangements to present waste at ground floor level. Where this is not achievable, our team that manages waste should be consulted prior to submission of a full planning application.
- 4.13** Where compactors are planned at basement or ground level, it is preferred that provision for storage of organic waste/compostable materials is also made at the same level. If waste storage is at basement level, vehicle access should be provided at this level, or there should be adequate provision to move waste to the ground floor for collection.

**4.14** Where chute systems are proposed, they must be designed in accordance with the most up to date British Standard or equivalent replacement document; also there must be provision for the collection of refuse, recyclable and compostable materials via this method. If used, chutes should not be spaced at more than 60 metres intervals, on the assumption that an occupier should not be required to carry waste a distance of more than 30 metres. The chute termination should be by a bifurcated baffle plate or by a swivel chute end.

**4.15** Where underground systems are proposed, there must be provision for collecting refuse and recycling via this method. Provision for the storage and collection of compostable materials must be made at the same level and in the same area. Please refer to the supplementary guidance for more information on underground collection systems.

**4.16** For mixed-use developments there must be segregation between residential and commercial waste storage areas. The locations of the waste containers should be clearly shown on the plans, including the dimensions and capacities proposed.

### Individual properties

**4.17** Proposals involving detached, semi-detached and mid-terrace houses and other property without side or rear access must include unobtrusive areas suitable for housing two wheelie bins (no more than 240 litres), a food waste caddy and a garden waste container. The container must not intrude on the street scene, and therefore must be contained within an appropriate front wall, fence or hedge for the garden, or alternatively within a dedicated and suitably designed structure within the boundary of the premises.

**4.18** Such areas must be convenient for use by residents with easy access to the curtilage by the waste collection crews and steps should be avoided. If the area has a gradient, it should not exceed 1:12 towards the vehicle. If the storage area is within prominent view of the highway, a footpath or other public vantage point, then the bin area should be screened to avoid public usage. All waste containers should be stored not more than 10 metres from the collection point and should be unobstructed. If the collection point is in front of parking spaces, there

should be adequate room for them to be wheeled to the collection vehicle. There must be at least 150mm clearance between each bin and the enclosure must have a minimum height of 1200mm.

**4.19** All containers for individual properties should conform to British Standard BS EN 840 or the equivalent replacement document.

**4.20** Developers are encouraged to install compost bins in all private gardens to encourage their use by residents.

## **Bulky waste collection**

**4.21** All multi-storey residential developments must have a separate space for the short-term storage of bulky items of furniture or electrical items, at ground level. It may be appropriate to provide covered accommodation for the storage of these items, as some may be re-usable. The number of stores depends on the number of blocks, size of homes and number of units. Where necessary, our team that manages waste and the fire brigade should be consulted to help with advice regarding size of bulky waste store and minimisation of arson risk.

## **Commercial waste provision**

**4.22** In mixed developments segregation of residential and commercial waste is required. Every commercial unit should have their own independent bin store areas. The residential development should follow guidance as detailed in the section on 'waste collection systems for residential properties – multi occupancy properties.

**4.23** It is difficult to anticipate the volume of refuse and recycling produced at commercial premises. Further guidance and recommendations can be found in BS5906:2005 Code of Practice or the equivalent replacement document for waste management in buildings. Developers can also contact our team that manages waste to discuss their requirements.

**4.24** It should also be noted, that the waste regulations require the separate collections of paper, metal, plastic and glass where technically, economically, environmentally practicable. Developers should ensure that this requirement can be met, where necessary.

## **Waste collection vehicles – specifications & guidance**

**4.25** Developers should ensure that roads have suitable foundations and surfaces to withstand the maximum payload of vehicles. Manhole covers and gratings etc located on the highway must also be strong enough to withstand this weight.

**4.26** Vehicles should not be expected to reverse. If this is unavoidable, then the maximum reversing distance should be 20 metres. A safe stopping bay or equivalent should be provided with a sufficient turning area and manoeuvring space for the collection vehicle (which may be a six-wheeled HGV) as specified within the Freight Transport Association's publication 'Designing for Deliveries' or the equivalent replacement document.

**4.27** Developers should demonstrate with auto tracks that the collection vehicles (using our waste collection vehicle measurements) can manoeuvre around and within the site (where applicable) without undue impact on pedestrian safety or traffic flow. Developers should contact our team that manages waste for information on the vehicles currently in operation.

## **Maintenance of waste containers and related facilities**

**4.28** The maintenance of bin stores, chute systems, containers, underground systems, paths and roadways is the responsibility of the managing agent, landlord, residents' board or equivalent, with the exception of council-owned container.

**4.29** Managing organisations are responsible for the management and maintenance of bin stores, waste containers including underground systems, compactors and automated waste collection systems.

**4.30** We are not responsible for container maintenance or replacement. Managing organisations must ensure that the containers are cleaned regularly and properly maintained.



### Non-traditional mass waste collection and storage systems

- 4.31** There are a number of non-traditional waste collection systems that can be incorporated into developments. All of the systems require land to be set aside to store collected waste materials.
- 4.32** While it is not our responsibility to prescribe the type of waste collection and storage facility developers should incorporate into a development, the facility must be compatible with our waste collection vehicles. It is therefore advised that applicants/developers contact the team that manages waste collection prior to the submission of a planning application to ascertain whether the system is compatible with our collection service.
- 4.33** There are three main groups of waste collection systems and some are on-site waste processing systems, which could be considered to help us reduce the burden on waste collection services. . These are as follows;
- Underground container systems.
  - Vacuum collection systems.
  - On-site compaction and container collection systems.
- 4.34** It should be noted that the above is not an exhaustive list of alternative waste collection and storage systems and developers/applicants can present other methods that are compatible with our waste collection service.

### Underground container collection systems

- 4.35** Underground container collection systems are already in use within the borough and have proven to be a good solution to high-density developments and they can also be incorporated into developments of much lower densities. This system involves a large steel container set into a concrete hole underground, above which is a set of inlet containers to allow residents to deposit bagged waste materials. The design of the inlet containers can vary greatly and can be adjusted to suit the specific design requirements of the development or streetscape.

- 4.36** These systems are suitable for dry mixed recycling and residual waste. The container systems allow more waste to be stored in the centralised underground containers than traditional bins/bags, and therefore reduces vehicle movements. In instances where there is more than one building proposed as part of the development, the underground container system eliminates the need for a refuse collection from each building.
- 4.37** The flexibility of these systems is such that the inlet containers can be located outside of the building, in front courtyards allowing residents to deposit waste when they are leaving the building. Access to the containers can be restricted for residents only, through the use of fobs that are operated by a sensor. Containers can also be fitted with sensors to measure their fill level.
- 4.38** It should be noted that these systems are not generally suitable for food waste and therefore additional space within the development is required to accommodate this fraction of waste.

### Vacuum collection systems

- 4.39** Vacuum systems involve waste being conveyed through a network of underground pipes from residential blocks to a central bulking point or 'terminal building' where the materials are bulked up into containers. The system is capable of dealing with all three fractions of waste, residual, dry mixed recycling and food waste. Like the underground container system this one also allows more waste to be stored and therefore reduces vehicle movements.
- 4.40** Residents 'post' waste materials into the inlet containers, similar to the underground container systems. The system is operated automatically through a system of sensors and valves that are linked to a computer system located in the terminal building. It is possible to integrate the vacuum system within buildings, so that residents can place waste materials into chutes on each floor of their block for ease of use/access.
- 4.41** The flexibility of these systems is such that the inlet container can be located inside or outside of the building to suit budget and design.



## On-site compaction and container collection systems

- 4.42 On-site compaction and collection systems principally involve large roll on roll off containers for storing waste materials combined with an electrically powered hydraulic ram to reduce the volume of waste inside the containers and a hopper for depositing waste materials safely into the container.
- 4.43 Containers will be required to collect segregated fractions of waste.
- 4.44 If internal chutes are used the development must be designed to ensure that there is either one chute per waste stream, or there is a 'diverter' system attached to the end of the chute which directs materials into the correct hopper and container. Residents would control the system through selecting the correct button on a panel located at the chute door.
- 4.45 The flexibility of these systems is such that access can be restricted to residents through sensors.

## Food waste macerators

- 4.46 Food waste disposal units within developments are also an option, subject to approval from Thames Water. They involve small macerators installed under domestic kitchen sinks used to grind food waste into slurry to allow for it to be disposed of through the normal wastewater system. The macerator is fitted just underneath the kitchen sink and once installed it mechanically chops and grinds food waste using blades. . These systems can also reduce the need for traditional bin collection, as the materials are treated by water treatment companies and the sewerage system.

## Appendix 5: Strategic policies in the Local Plan for the purposes of neighbourhood planning

### Introduction

**5.1** The National Planning Policy Framework requires local planning authorities to set out clearly their strategic policies in order to support the requirement for neighbourhood plans to be in general conformity with the strategic policies of the Local Plan.

### Strategic policies

**5.2** All policies and site allocations in the Local Plan are considered to be strategic in nature, with the exception of the following policies.

- D.SG3: Health impact assessments
- D.SG4: Construction of new development
- D.DH8: Amenity
- D.DH9: Shopfronts
- D.DH10: Advertisements, hoardings and signage
- D.ES9: Noise and vibration

## Appendix 6: Noise

### Noise thresholds

- 6.1 Noise can have a significant effect on the environment and on the quality of life enjoyed by individuals and communities. Noise can interfere with residential and community amenity and the utility of noise-sensitive land uses.
- 6.2 The significance of noise impact varies dependent on the different noise sources, receptors and times of operation presented for consideration within a planning application. Therefore, thresholds for noise and vibration evaluate noise impact in terms of various 'effect levels' as described in the National Planning Policy Framework.

### Aims

- 6.3 Policy D.ES9 of the Local Plan (see section 3) is seeking to effectively control and manage environmental, neighbour and neighbourhood noise within the context of government policy on sustainable development.
  1. Avoid significant adverse impacts on health and quality of life.
  2. Mitigate and minimise adverse impacts on health and quality of life.
  3. Where possible, contribute to the improvement of health and quality of life.

### Approaches to managing noise

1. **Good design** - minimising the number of sensitive receptors exposed to noise; ensuring adequate distances between the noise source and sensitive receptors or areas, limiting conflict of use in the development both internally and externally; utilising where possible barriers, natural or otherwise, other buildings, or non-critical rooms in a building.
2. **Engineering** - reducing noise at source; improving the sound insulation internally and externally of exposed receptors; screening by purpose-built barriers.
3. **Administrative** - limiting operation time of source, restricting activities allowed on the site, specifying an acceptable noise limit. Several of these measures may be incorporated into the design of a development proposal. Where development is likely to be affected by, or give rise to, high noise levels, applicants are advised to seek the advice of environmental health officers or those with similar expertise.

### General principles

- 6.4 When considering applications for development that will be exposed to an existing noise source, we will take account the ambient noise level existing at the proposed location at the time of the application and any future likely increase in likely noise impact that may reasonably be anticipated to occur due to development in the foreseeable future.
- 6.5 In the case of applications involving noise sensitive developments, we will require an applicant to include information about the noise impact of development, or the assessed effect of an existing noise source and transport, industrial or commercial operation upon the development proposed.

- 6.6** Where an environmental impact assessment is required, proposals will be required to consider the likely effects of noise both positive and negative on the local amenity and any sensitive receptors: the cumulative noise impact should always be taken into account.
- 6.7** A noise impact assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure as set out in policy D.ES9. Developers will be required to assess the impact of the proposal as a noise generator or receptor, as appropriate. It will also be required to demonstrate in full how the development will be designed, located and controlled to mitigate (as appropriate) the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.
- 6.8** In all cases, the best practical means of mitigation will be required to mitigate noise impact to an appropriate level, and in liaison with our environmental health service.
- 6.9** Where necessary, we will use planning conditions and enter into planning obligations under Section 106 of the Town and Country Planning Act 1990 (as modified by Section 12 of the Planning and Compensation Act 1991) to control noise levels.

#### Further information and guidance

- Noise Policy Statement for England (Department for Environment, Food and Agriculture, 2010)
- Guidance on the control of odour and noise from commercial kitchen exhaust (Department for Environment, Food and Agriculture, 2011)
- British Standard 8233: Guidance on Sound insulation and noise reduction for buildings (2014)
- British Standard 4142: Methods for rating and assessing industrial and commercial sound (2014)
- British Standard 6472: Guide to evaluation of human exposure to vibration in buildings (2008)
- BB93: Acoustic design of schools: performance standards (2015)
- British Standard 5228: Code of practice for noise and vibration on construction and open sites (2014)

#### Design criteria

- 6.10** Three basic criteria have been developed to inform the design and layout of proposed developments; these being aimed at guiding applicants as to the degree of detailed consideration needed to be given to noise in any planning application. The design criteria outlined below are defined in the corresponding noise tables.
- NOEL – No observed effect level.
  - LOAEL – Lowest observed adverse effect level.
  - SOAEL – Significant observed adverse effect level.
- 6.11** The values will vary depending on the context, type of noise and sensitivity of the receptor.
- Green – where noise is considered to be at an acceptable level. In this category development is likely to be granted.

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- Amber – where noise is observed to have an adverse effect level, but which may be considered acceptable when assessed in the context of other merits of the development. In this category permission is likely to be refused unless a good acoustic design process is followed.
- Red – where noise is observed to have a significant adverse effect. In this category development is likely to be refused. Applicants should seek expert advice on possible noise mitigation measures.

### **Proposed developments - sensitive to noise**

- 6.12** Special consideration will need to be given to noise-sensitive developments that are proposed in areas which are, or expected to become, subject to levels of noise which are likely to have an adverse effect. The threshold of acceptability of the noise will primarily depend on two factors: the intended use of the noise sensitive development and the source of the noise experienced, or likely to be experienced.

Noise levels applicable to noise sensitive residential development proposed in areas of existing noise

Dominant noise source	Assessment location	Design period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Anonymous noise such as general environmental noise, road traffic and rail traffic	Noise at 1 metre from noise sensitive facade/freefield	Day	<50dBLAeq, 16hr*	50dB to 69dBLAeq, 16hr*	>69dBLAeq, 16hr*
		Night	<45dBLAeq,8hr <40 dBLAeq,8hr**	Between 45dB and 60dB LAeq,8hr.	>60dB LAeq,8hr > 80dB LAfmax
	Inside a bedroom	Day	<40dBLAeq,16hr	40dBLAeq,16hr	>40dBLAeq,16hr
		Night	<35dBLAeq,8hr 70dBLAmax,fast	35dB to 40dBLAeq,8hr 80dBLAmax,fast	>40dBLAeq, 8hr >80dBLAfmax
	Outdoor living space (free field)	Day	<50dBLAeq,16hr	50dB to 55dBLAeq,6hr	>55dBLAeq,16hr
Non-anonymous noise	See guidance note on non-anonymous noise				

\*LAeq, T values specified for outside a bedroom window are facade levels

\*\*Lnight values specified for outside a bedroom window are free field levels

**6.13** The levels given above are for dwellings; however, levels are use specific and different levels will apply dependent on the use of the premises. We will also take into account the likely times of occupation for types of development and will be amended according to the times of operation of the establishment under consideration.

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### Industrial and commercial noise sources

**6.14** A relevant standard or guidance document should be referenced when determining values for LOAEL and SOAEL for non-anonymous noise.

**6.15** Where appropriate, it is expected that British Standard 4142:2014 'Methods for rating and assessing industrial and commercial sound' will be used. For such cases, a 'rating level' of 10 dB below background (15dB if tonal components are present) should be considered as the design criterion.

### Noise insulation

Where the development falls within an area of high noise (amber and red), the 'good' standard of British Standard 8233 should be met: the reasonable standard may only be allowed where other overriding factors have been agreed with our environmental health service.



Noise levels applicable to proposed industrial and commercial developments (including plant and machinery)

Existing noise sensitive receptor	Assessment location	Design period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Dwellings**	Garden used for main amenity (free field) and outside living or dining or bedroom window (facade)	Day	'Rating level' 10dB* below background	'Rating level' between 9dB below and 5dB above background	'Rating level' greater than 5dB above background
Dwellings**	Outside bedroom window (facade)	Night	'Rating level' 10dB* below background and no events exceeding 57dBLAmax	'Rating level' between 9dB below and 5dB above background or noise events between 57dB and 88dB LAmax	'Rating level' greater than 5dB above background and/or events exceeding 88dBLAmax

\*\*levels given are for dwellings; however, levels are use specific and different levels will apply dependent on the use of the premises.

**6.16** The high density of industrial plant and air-handling units (including kitchen extracts, air-condition units and refrigeration plant) has a cumulative effect of increasing the overall background noise level. To prevent this level continually increasing to the detriment of the local residential amenity in those locations, there will be an expectation that all new noise sources would be expected to operate at a rating level (British Standard 4142) of 10dB below the background noise level measured as a LA90.

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- 6.17** 10dB should be increased to 15dB if the noise contains audible tonal elements. (day and night). However, if it can be demonstrated that there is no significant difference in the character of the residual background noise and the specific noise from the proposed development then this reduction may not be required.
- 6.18** In addition, a frequency analysis (to include the use of noise rating curves or other criteria curves) for the assessment of tonal or low frequency noise may be required.
- 6.19** The periods in the table correspond to 0700 hours to 2300 hours for the day and 2300 hours to 0700 hours for the night. We will take into account the likely times of occupation for types of development and will be amended according to the times of operation of the establishment under consideration.
- 6.20** There are certain smaller pieces of equipment on commercial premises, such as extract ventilation, air conditioning units and condensers, where achievement of the rating levels (ordinarily determined by a British Standard 4142 assessment) may not afford the necessary protection. In these cases, we will generally also require a noise rating curve specification of NR35 or below, dependent on the room (based upon measured or predicted Leq,5mins noise levels in octave bands) 1 metre from the facade of affected premises, where the noise sensitive premise is located in a quiet background area.

### Entertainment noise

- 6.21** Assessments for noise from entertainment and leisure premises must include consideration to amplified and unamplified music, human voices, footfall and vehicle movements and other general activity. Appropriate metrics must be used to measure and assess the noise impact including LAeq and LAm<sub>ax</sub> metrics and appropriate frequency spectrum. Planning permission will not be granted in instances where it is not possible to achieve suitable and sufficient internal noise levels with reference to the most up to date and appropriate guidance within proposed noise sensitive receptors despite appropriate mitigation proposals due to the totality of noise from existing entertainment venues.

Noise levels applicable to proposed entertainment premises (customer noise)

Noise sensitive receptor	Assessment location	Design period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Dwellings	Garden used for amenity (free field)	Day	The higher of 55dB LAeq,5min or 10dB below existing LAeq,5min without entertainment noise	56dB to 60dB LAeq,5min or 9dB to 3dB below existing LAeq,5min without entertainment noise	The higher of 61dB LAeq,5min or 2dB below existing LAeq,5min without entertainment noise
Dwellings	Garden used for amenity (free field)	Evening	The higher of 50dB LAeq,5min or 10dB below existing LAeq,5min without entertainment noise	51dB to 55dB LAeq,5min or 9dB to 3dB below existing LAeq,5min without entertainment noise	The higher of 56dB LAeq,5min or 2dB below existing LAeq,5min without entertainment noise
Dwellings	Garden used for amenity (free field)	Garden	The higher of 45dB LAeq,5min or 10dB below existing LAeq,5min without entertainment noise	46dB to 50dB LAeq,5min or 9dB to 3dB below existing LAeq,5min without entertainment noise	The higher of 51dB LAeq,5min or 2dB below existing LAeq,5min without entertainment noise

6.22 For entertainment and plant noise rating curves should be measured as a 15 minute linear Leq at the octave band centre frequencies.

Room	Noise rating curve	Design period
Bedrooms	NR25	23:00-07:00hrs
All habitable rooms	NR25	07:00-23:00hrs

Vibration levels from uses such as railways, roads, leisure and entertainment premises and/or plant or machinery at which planning permission will not normally be granted or in line with the most current version of British Standard 6472

Vibration description and location of measurement	Period	Time	Vibration levels (Vibration dose values)
Vibration inside critical areas such as a hospital operating theatre	Day, evening and night	00:00-24:00	0.1 VDV ms <sup>-1.75</sup>

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Vibration description and location of measurement	Period	Time	Vibration levels (Vibration dose values)
Vibration inside dwellings	Day	07:00-23:00	0.8 VDV ms <sup>-1.75</sup>
	Night	23:00-07:00	0.4 VDV ms <sup>-1.75</sup>
Vibration inside offices	Day, evening and night	00:00-24:00	0.4 VDV ms <sup>-1.75</sup>
Vibration inside workshops	Day, evening and night	00:00-24:00	0.4 VDV ms <sup>-1.75</sup>

We recommend that you seek advice from our environmental health department in advance of any noise surveys on the location of measurements and the nearest noise sensitive receptor.

## Appendix 7: Housing trajectory

- 7.1** The tables below illustrate the borough's housing trajectory based on expected net additional housing delivery (both conventional and non-conventional) over a 15-year period.
- 7.2** Tower Hamlets has a supply pipeline of over 54,000 additional homes over the plan period (2016-2031). Around 27,000 of these homes are from sites currently under development or with planning permission (as at August 2017). It is estimated that over the next ten years more than 42,000 additional homes will be provided across the borough.
- 7.3** Tower Hamlets has a sufficient supply of land to meet its objectively assessed housing need (46,458 homes) during the entire plan period. We will also be meeting and exceeding the London Plan target to help meet city wide needs up to 2026.
- 7.4** While there will be a shortfall towards the end of the plan period, we are committed to working with our partners (including the Greater London Authority) to maximise the supply and delivery of housing within the parameters of sustainable development and address this unmet need.

Housing pipeline and trajectory against targets

Timeframe	Net additional housing target	Projected housing supply – large sites and windfall sites	Number above or below the housing target
2016-21	19,655	22,544	2,889
2021-26	19,655	19,730	75
2026-31	19,655	12,180	-7,4
<b>The plan period: 2016 - 31</b>	<b>58,965</b>	<b>54,455</b>	<b>-5,320</b>

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Housing pipeline against development status

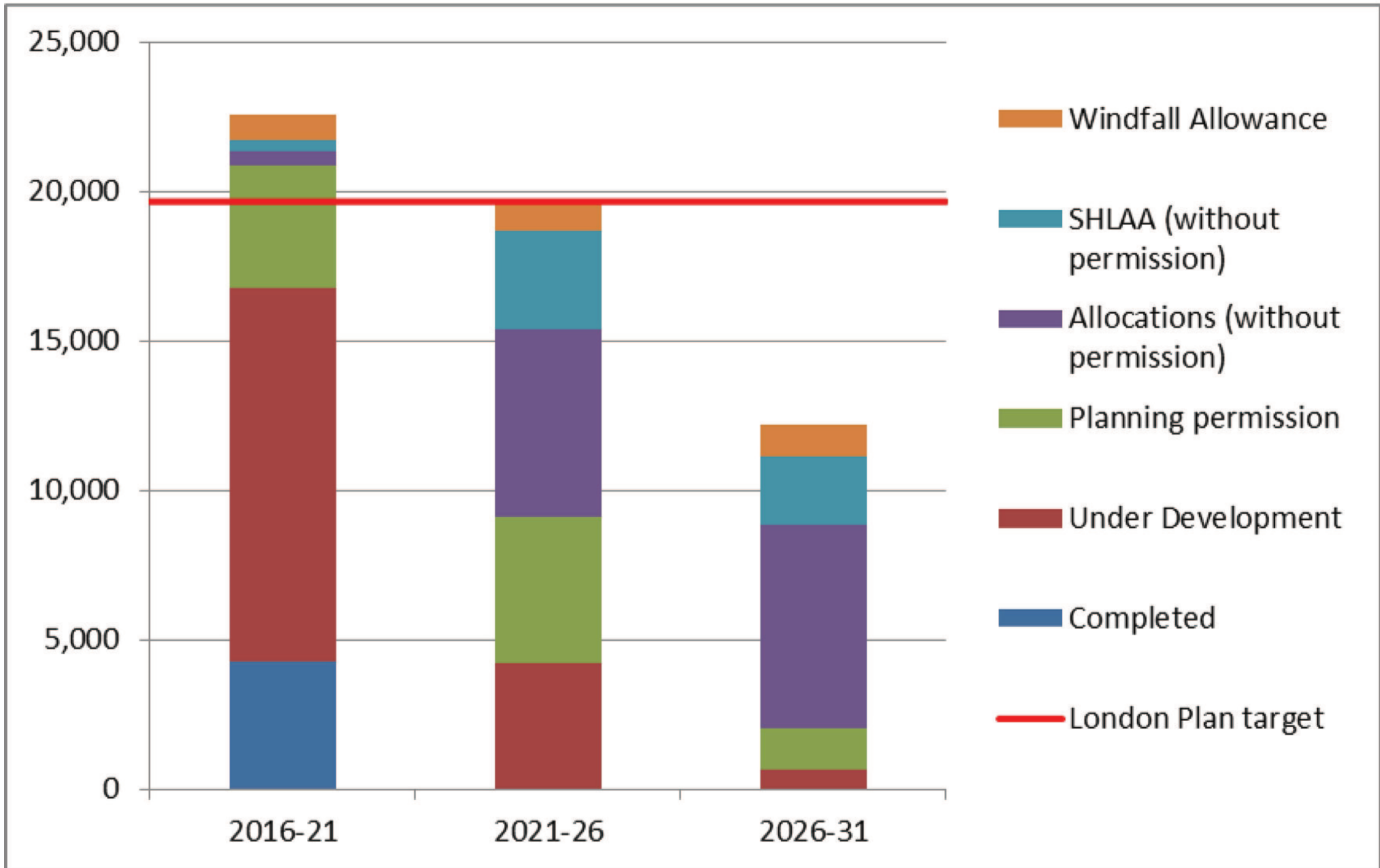
Status	2016-21	2021-26	2026-31	The plan period: 2016-31
Completed	4,260	0	0	<b>4,260</b>
Under development	12,505	4,200	640	<b>17,345</b>
Prior approval	340	0	0	<b>340</b>
Full planning permission	2,937	3,654	711	<b>7,302</b>
Hybrid planning permission	539	726	514	<b>1,779</b>
Outline planning permission	300	533	174	<b>1,007</b>
Allocations (without permission)	448	6,283	6,815	<b>13,546</b>
'Strategic Housing Land Availability Assessment' (SHLAA) sites (without permission)	355	3,259	2,251	<b>5,866</b>
Windfall allowance	860	1,075	1,075	<b>3,010</b>
<b>Total</b>	<b>22,544</b>	<b>19,730</b>	<b>12,180</b>	<b>54,455</b>

The housing trajectory is based on the following assumptions:

- Housing completions of 3,121 in 2015/16 creating a deficit of 810 homes that is carried forward into the plan period.
- Site build out rate limited to 500 units over 5 year period (or 100 units a year), unless specific evidence indicates otherwise.
- The following unit delivery 'lag times' unless specific evidence indicates otherwise:
  - + 0 months for sites where works on site have commenced
  - + 24 months for sites with a current full planning permission
  - + 30 months for sites with prior approval for development or "hybrid" permission
  - + 36 months for sites with a current outline planning permission
  - + 54 months for other "deliverable" sites, but without a current planning permission (i.e. maximum of 50 units in the deliverable supply from any one site).
- An annual windfall allowance (smaller sites providing less than 10 homes) of 215 units based on average windfall delivery over the past 5 years.

		Isle of Dogs & South Poplar	City Fringe	Lower Lea Valley	Central	Total
<b>Conventional housing</b>	<b>Completed (2016/17)*</b>	1,625	891	629	1,115	4,260
	<b>Under development</b>	12,846	1,470	1,560	1,057	16,933
	<b>Prior approval</b>	119	178	0	43	340
	<b>Full planning permission</b>	4,831	1,148	366	843	7,188
	<b>Hybrid planning Permission</b>	0	1,779	0	0	1,779
	<b>Outline planning permission</b>	0	774	130	103	1,007
	<b>Allocations (without permission)</b>	9,561	652	2,186	1,146	13,546
	<b>SHLAA (without permission)</b>	836	2,426	524	2,080	5,8606
<b>Non-conventional housing</b>	<b>Under development</b>	0	0	0	412	412
	<b>Full planning permission</b>	30	12	0	72	114
	<b>Borough-wide windfall allowance**</b>	753	753	753	753	3,010
	<b>Minimum number of additional homes between 2016-31</b>	30,601	10,083	6,148	7,624	54,455
	<b>Percentages</b>	56%	19%	11%	14%	100%





## APPENDIX 2: SUMMARY OF THE REPRESENTATIONS

The table below outlines the headline key issues raised during the regulation 19 consultation on the Local Plan and an overview of the further work that the council has undertaken to address these issues.

Summary of representations	Our response
<b>Delivering sustainable growth</b>	
<ul style="list-style-type: none"> <li>Location and distribution of growth: the Isle of Dogs and South Poplar has too much growth at the expense of other areas (e.g. Whitechapel and central parts)</li> </ul>	<p>The London Plan establishes opportunity areas in London where high growth is to be encouraged, as they have good access to services, transport and employment opportunities, as well as available developable land. The Isle of Dogs and South Poplar is one such area.</p> <p>Moreover, the assumed distribution of growth is based on the best available data in relation to planning permissions, site allocations and available land, having assessed delivery constraints (e.g. conservation and land use restrictions). The locations of growth do not dictate where growth should go; it represents our understanding of where growth is coming forward. The growth areas in the plan are a result of the extensive work undertaken with the GLA through the London Strategic Housing Land Availability Assessment. This considers where land is available to develop and the probability of it coming forward for development. The land availability in the borough reflects the history of the borough's development and changing role from industrial to residential uses.</p>
<ul style="list-style-type: none"> <li>Health impact assessments should only be required where major development schemes are anticipated to have significant implications for people's health and well-being (as per the London Plan).</li> </ul>	<p>No change. The Local Plan confirms that all major developments will be required to undertake a rapid HIA. This is consistent with the approach set out in the London Plan.</p> <p>Due to local circumstances (as evidenced in the Tower Hamlets Health and Wellbeing Strategy), the requirement also applies to certain types of developments (e.g. schools) and certain areas (e.g. poor air quality). We only require more detailed HIAs on developments of a scale referable to the GLA. We consider this to be proportionate. However, we recognise that the wording of the policy could be clarified to make it clearer what is required.</p>
<ul style="list-style-type: none"> <li>The exemption of schemes from vacant building credit has been challenged.</li> </ul>	<p>Disagree. Vacant building credit is not appropriate in Tower Hamlets because it has the potential to adversely affect our affordable housing target.</p>
<b>Creating attractive and distinctive places</b>	
<ul style="list-style-type: none"> <li>Further clarity is sought on how development exceeding the density guidelines set out in the London Plan will be assessed.</li> </ul>	<p>We propose minor modifications to include more guidance on the cumulative impacts of development and the relevant density matrix range from the London Plan.</p>
<ul style="list-style-type: none"> <li>Local community groups consider that the historic gasholders should be afforded greater protection and incorporated within new development</li> </ul>	<p>We propose minor modifications (e.g. gasholders no 2 and no 5 at Marian Place in Bethnal Green will be referenced in the supporting text)</p>
<ul style="list-style-type: none"> <li>Some consultees have challenged the basis for defining the locally designated views and landmarks</li> </ul>	<p>No change. More information on how the views and landmarks (e.g. borough-designated views and the skyline of strategic importance) have been defined will be set out in a background paper as these have been derived from the Conservation Area Appraisals and Management Guidelines.</p>
<ul style="list-style-type: none"> <li>The general thrust of the tall building policy is supported by developers and landowners. However, some have objected to the extent of the tall building zones where they have aspirations to develop tall buildings within close proximity of the zones</li> </ul>	<p>Development of tall buildings is not precluded outside of these zones, including within opportunity areas and site allocations. Outside of these zones, proposals will be subject to additional criteria to ensure they have an acceptable impact on the townscape, provide sufficient distance from other tall buildings and unlock strategic infrastructure constraints.</p> <p>Further clarification on the definitions and scope of the policy is set out in the minor modifications table.</p>
<ul style="list-style-type: none"> <li>Tall building zones should also cover the opportunity areas, site allocations and areas of high accessibility to public transport (e.g. Whitechapel).</li> </ul>	<p>Opportunity areas cover a significant proportion of the borough's land area but are necessarily suitable for tall buildings due to accessibility, heritage and townscape constraints. Tall buildings are directed to existing clusters which are located in the opportunity areas and some of the site allocations.</p>
<ul style="list-style-type: none"> <li>Fire safety – the impact of the Grenfell disaster should be considered</li> </ul>	<p>Fire and safety considerations are specifically addressed in the Local Plan (see parts 3 and 6). In relation to tall buildings, consideration of public safety requirements will need to be demonstrated as part of the overall design, including the provision of evacuation routes (see policy D.DH6).</p>
<ul style="list-style-type: none"> <li>The design policies are overly restrictive (e.g. stepped down approach to building heights in the Isle of Dogs).</li> </ul>	<p>The policies offer an appropriate balance between flexibility and prescription. In the Isle of Dogs, tall buildings will be carefully managed to ensure the continued preservation of the skyline of strategic importance in Canary Wharf and long distance views, especially from Maritime Greenwich world heritage site. A number of tall building proposals are planned or underway and the tall building zones reflect the location of these emerging clusters.</p>
<ul style="list-style-type: none"> <li>Lack of consultation on the tall building zones and the evidence base.</li> </ul>	<p>Consultees were given the opportunity to scrutinise the evidence (Tall Building Study) well in advance of the regulation 19 consultation.</p>

<b>Meeting our housing needs</b>	
<ul style="list-style-type: none"> <li>• Objections to the housing mix and how it interacts with the threshold approach to viability (policy S.H1)</li> </ul>	We propose minor amendments to the supporting text - so that schemes meet/deliver at least 35% affordable housing and 70/30 affordable rented and intermediate split can seek a more flexible mix without providing detailed viability evidence. As a minimum, such proposals must generally meet the Local Plan requirements for the delivery of family housing in the affordable rented tenures and must provide a minimum of 10% of family housing in the market housing tenure.
<ul style="list-style-type: none"> <li>• Housing rents and products (greater acknowledgement of build to rent and co-living)</li> </ul>	These products do not meet local need in Tower Hamlets and are not considered acceptable to reduce the affordable housing requirement.
<ul style="list-style-type: none"> <li>• Approach to incremental development (contrary to government policy)</li> </ul>	The purpose of this policy is to ensure that the affordable housing requirements for developments are fairly and equitably applied on all residential developments. Incremental developments would still be able to provide viability assessments to demonstrate delivery constraints where required, so this policy adds no additional burden to that which would apply to any residential development.
<ul style="list-style-type: none"> <li>• Off-site provision / contributions (affordable housing)</li> </ul>	50% affordable housing off-site requirement has been viability assessed and found to be viable
<ul style="list-style-type: none"> <li>• Object to the requirement for two lifts for the most accessible form of housing which is socially rented (Greater London Authority)</li> </ul>	Comment noted. Further evidence on the rationale behind this requirement will be undertaken to strengthen our position at the independent examination.
<ul style="list-style-type: none"> <li>• Small sites (affordable housing)</li> </ul>	No change. Affordable housing contributions are considered necessary due to the role that smaller sites play in delivering housing (which is due to grow following the new London Plan approach to small sites) and the affordable housing need in the borough. It has also been tested and found viable in the Local Plan Viability Assessment and as such we are confident that the policy will not affect the delivery of small sites.
<ul style="list-style-type: none"> <li>• Student housing – too restrictive</li> </ul>	We propose a minor amendment to give more flexibility to student housing.
<ul style="list-style-type: none"> <li>• Housing target will not be met</li> </ul>	We accept that the Local Plan needs to address the current London Plan target. We acknowledge that at the point in time in which we assessed the housing trajectory there is a small shortfall in the last 5 years of the plan. The Housing Delivery Strategy outlines how we will seek to overcome this and indicates the plan will be regularly monitored and reviewed if delivery does not increase. The GLA have accepted this position and consider the trajectory to be sound.
<b>Delivering economic growth</b>	
<ul style="list-style-type: none"> <li>• The policies are over-protective of employment uses and will prejudice redevelopment opportunities (e.g. non-employment locations).</li> </ul>	No change. It is considered the scope of employment land as defined in the plan is in line with national and London Plan policy and definitions. The employment designations are considered to be appropriate and backed by evidence. There is also scope for some level of non-employment floorspace where it supports the function of the area
<ul style="list-style-type: none"> <li>• Loss of employment: Period of active marketing should be reduced from 12 to 6 months.</li> </ul>	No change – this is based on guidance from the Mayor of London's Central Activities Zone SPG.
<ul style="list-style-type: none"> <li>• 20% target for employment floorspace in the City Fringe is too low.</li> </ul>	It is considered that the 20% figure is a useful overall target, as the Tower Hamlets Activity Areas are more mixed in nature but encompass parts of other designations such as the Whitechapel LEL where a higher proportion of employment space would be anticipated.
<ul style="list-style-type: none"> <li>• Maximum floorspace limits on residential development in the Preferred Office Locations and Central Activities Zone are considered to be too restrictive (e.g. 25% residential in the secondary POL).</li> </ul>	Targets are seen to be appropriate to protect employment/CAZ functions in these important areas. However, policy wording will be amended to give more flexibility on 25% in the secondary POL and 50% in the Central Activities Zone (Zone C).
<ul style="list-style-type: none"> <li>• Affordable workspace threshold (10% of new employment floorspace within major commercial schemes) needs to be more fully justified and should be subject to viability testing.</li> </ul>	Further justification will be provided in the supporting text. The threshold has been viably tested and this confirms that the 10% discount of market rent is easily viable. The justification for the threshold will be set out in the addendum to the Tower Hamlets Growth Sectors and SME Workspace Study (2016).
<b>Revitalising our town centres</b>	
<ul style="list-style-type: none"> <li>• The retail thresholds within district and neighbourhood centres and neighbourhood parades (e.g. 60% of ground floor units should be A1 retail along primary shopping frontages) should be removed.</li> </ul>	The thresholds are considered appropriate as they maintain a pre-dominance of A1 use while allowing suitable flexibility for a range of other uses to come forward.
<ul style="list-style-type: none"> <li>• 200 square metres retail threshold outside of town centres is not justified</li> </ul>	The purpose of the threshold is to ensure that out-of-centre retail development, such as large convenience stores, does not harm the vitality and viability of town centres. Where individual retail units exceed the size thresholds set out in this policy, applicants will be expected to submit an assessment of impact to town centre vitality and viability in accordance with the National Planning Policy Framework.
<ul style="list-style-type: none"> <li>• Betting shops should not be excluded from primary shopping frontages, neighbourhood centres and neighbourhood parades in town centres</li> </ul>	Emerging evidence indicates that the recent proliferation of betting shops is having a negative impact on the vitality and viability of the borough's town centres. It is about protecting the attractiveness and vitality of primary frontages, keeping out uses with more negative social impacts, such as betting shops.
<ul style="list-style-type: none"> <li>• Request to change the status of Canary Wharf to a Metropolitan Centre</li> </ul>	The London Plan makes it clear that Canary Wharf has the potential to be reclassified as a Metropolitan Centre over the plan period. We also recognise that Canary Wharf

	is now fulfilling this role which has been sufficiently recognised in the Local Plan.
<ul style="list-style-type: none"> <li>Hot food take aways – using a 200 metres buffer zone is contrary to national policy (assumes all hot food takeaways offer limited choice and same poor standard of food; no evidence provided of link between harm and proximity to takeaways)</li> </ul>	It is acknowledged that hot food takeaways are not the only source of foods that contribute to unhealthy lifestyles, and that not all hot food takeaways provide unhealthy/poor quality food. Nonetheless, within Tower Hamlets, the overwhelming majority of hot food takeaways do provide food of poor nutrition. Our approach is more permissive than that proposed in the new London Plan and additional evidence is being compiled to support the council's position.
<ul style="list-style-type: none"> <li>Changes suggested to some of the town centre boundaries (e.g. Brick Lane and Crisp Street)</li> </ul>	We do not feel it is appropriate to extend or amend the town centre boundaries at this stage. We will review all town centre boundaries on an annual basis in order to reflect potential changes or extensions.
<b>Supporting community facilities</b>	
<ul style="list-style-type: none"> <li>Over allocation of schools, health and leisure facilities without clear justification</li> </ul>	<p>Sufficient leisure and health facilities have been identified to meet the borough's future needs which will be partially met through the re-provision of existing facilities on the proposed site allocations.</p> <p>The Local Plan allocates more primary school sites than is required for the following reasons.</p> <ul style="list-style-type: none"> <li>The council has a statutory requirement to deliver enough places but cannot guarantee any of the site allocations will be bought forward for delivery. The site allocations require comprehensive redevelopment and land assembly alongside major infrastructure to support large-scale housing and employment on relatively constrained development plots at high densities. The delivery of new schools will need to be carefully planned to ensure they can sensitively integrated into the overall development, whilst meeting the appropriate standards (including play space). Due to these constraints, in some instances, a site may only be able to deliver a 1 form of entry primary school.</li> <li>For some sites when they come forward for delivery, demand in that particular area may indicate that only a 1 form of entry primary school is required.</li> </ul> <p>The over allocation of secondary schools is also due to the uncertainty of sites coming forward in the right locations at the right time (4 out of 5 sites are required). The majority of existing secondary schools have limited capacity to meet future needs arising from this growth. Secondary school sites generally require larger plots as well as good access to public transport and services, particularly due to the fact that they have a wider catchment area than primary schools. Demand varies considerably across the borough; some areas have a surplus, whilst others have a deficit. Land is scarce in the borough and there are only a limited number of available and suitable sites to accommodate new or expanded secondary schools. Other issues (particularly poor air quality and viability constraints, such as costs of decontamination) may also render an allocated site incapable of delivering a primary or secondary school when it comes forward during the plan period.</p> <p>Further work is being undertaken to assess the latest school place projections following the household survey which took place at the end of 2017, thus enabling us to determine which school sites should be prioritised.</p>
<ul style="list-style-type: none"> <li>Request to include a specific policy on indoor sport facilities – no sufficient base to address future priorities and needs (Sport England)</li> </ul>	Indoor sport facilities are a type of community facility and the Indoor Sport Facilities Strategy tells us where they will be located. Minor amendments will be made to the policy wording to ensure that sport facilities are not lost to other types of development.
<b>Enhancing open spaces and water spaces</b>	
<ul style="list-style-type: none"> <li>Lack of playing pitch evidence (Sport England)</li> </ul>	An additional action plan has been developed alongside the Open Space Strategy to address the concerns of Sport England. This identifies specific locations where the identified playing pitch needs of the borough can be best met.
<ul style="list-style-type: none"> <li>Some consultees are requesting the de-designation of strategic open space (e.g. Metropolitan Open Land and Millwall Outer Dock) and green grid links (e.g. Green Spine)</li> </ul>	No change. The designations are given statutory protection.
<ul style="list-style-type: none"> <li>Double or triple counting: policy requirements on top of the Community Infrastructure Levy</li> </ul>	Where open space is delivered to a sufficient standard in line with the policies set out in the Local Plan, it will be considered as payment in kind.
<b>Managing our waste</b>	
<ul style="list-style-type: none"> <li>Objections to the safeguarding of Ailsa Street, Empson Street and Bow Midlands (part of the LLDC Strategic Industrial Land designation) as areas of search and the safeguarding of part of Clifford House within the Empson Street SIL</li> </ul>	No change. The sites and areas of search are required to meet the London Plan apportionment.
<b>Protecting and managing our environment</b>	
<ul style="list-style-type: none"> <li>Zero carbon standards – not justified</li> </ul>	LBTH recognises that the Written Ministerial Statement in 2015 changed the government's position in relation to zero carbon. It also indicated that the government would be commencing the requirements of the proposed amendments to the

	<p>Planning and Energy Act 2008, as announced in the Deregulation Act 2015. This has yet to occur, and the WMS does not outweigh the development plan. This policy maintains our current policy position and is in line with the GLA's Housing Supplementary Planning Guidance and draft London Plan.</p> <p>We have also assessed the viability and deliverability of the zero carbon requirements. This confirms that both the onsite requirements and offsite payments are viable and deliverable. In exceptional circumstances, developments will be able to submit viability information to demonstrate why these standards cannot be met and these will be assessed during the development management process.</p>
<b>Improving connectivity and travel choice</b>	
<ul style="list-style-type: none"> <li>Safeguarded wharfs – greater scope to incorporate a broader mix of uses in association with development. The Port of London Authority, however, requests a separate policy to raise the profile of the wharves, facilitate the use of freight and adequately assess the cumulative impacts of future developments.</li> </ul>	No change. We consider that sustainable freight should be covered under a composite policy and that sufficient detail and protection of safeguarded wharves is provided.
<ul style="list-style-type: none"> <li>Further clarification on the scope of the policies and links to relevant supporting evidence including studies and guidance (Transport for London)</li> </ul>	We propose amendments to the plan to address points of clarity and to link the policies to relevant supporting evidence and studies.
<b>Delivering sustainable places</b>	
<ul style="list-style-type: none"> <li>Some respondents argue that some of the requirements relating to site allocations are too onerous and should take more account of viability, site constraints and market conditions. This includes the mix of affordable housing units and the provision of strategic open space and schools.</li> </ul>	<p>We propose minor modifications to the text to take account of discussions with developers and landowners but the general thrust of the site requirements will be retained.</p> <p>Detailed viability work has been undertaken to consider the financial implications arising from the implementation of these policies. This concludes that the site allocations are viable and capable of being delivered (subject to negotiation on the provision of infrastructure and affordable housing at the planning application stage).</p>
<ul style="list-style-type: none"> <li>New bridges / crossings (e.g. Aspen Way) and newly identified routes should be included as part of the infrastructure requirements</li> </ul>	Developers are not expected to deliver all of the proposed bridges and routes and these matters have been taken into account in the delivery considerations of the relevant site allocations. The majority of these routes have been identified in the plan, as set out in the Green Grid Strategy Update. We are proposing minor modifications to the site allocation maps to reflect the update.
<ul style="list-style-type: none"> <li>Some developers / landowners have proposed boundary changes to the site allocations</li> </ul>	<p>These matters will need to be discussed at the examination in public. However, none of these changes would significantly affect the strategic direction of the Local Plan.</p> <p>The site allocation boundaries are based on existing planning application information or have been carried forward from the existing adopted Managing Development Document. These boundaries may change over the course of the plan period in response to development opportunities. The precise location of these boundaries will be determined at planning application stage.</p>
<ul style="list-style-type: none"> <li>Accuracy of figures and diagrams</li> </ul>	<p>We will make minor amendments to the figures and diagrams, where necessary. This includes:</p> <ul style="list-style-type: none"> <li>the location of the gasholders at Marian Place gas works and The Oval;</li> <li>the reconfiguration of some of the routes; and</li> <li>clarification on the status of bridges (existing or proposed).</li> </ul> <p>We will also make it clear that these figures are for illustrative purposes only and some of the details may be subject to change through the development management process.</p>
<ul style="list-style-type: none"> <li>Site context</li> </ul>	Additional information will be provided regarding the context of a site for the purposes of accuracy and clarification (e.g. Bow Common gasworks will include references to the adjacent conservation area and local nature reserve).
<ul style="list-style-type: none"> <li>Site specific requirements: Greater flexibility over the delivery of strategic open space and other types of infrastructure</li> </ul>	<p>No change. New strategic open space is required to meet the needs arising from the development as well as help address existing deficiencies across the borough.</p> <p>The Local Plan provides sufficient flexibility to take account of site-specific and local market circumstances over the course of the plan period.</p>
<ul style="list-style-type: none"> <li>Insufficient capacity to accommodate full-sized playing pitches</li> </ul>	New strategic open space will be consolidated to facilitate sport and recreation opportunities within the site allocations.
<ul style="list-style-type: none"> <li>Some developers and landowners are objecting to the non-allocation of sites</li> </ul>	No change. The capacity of these sites does not meet the housing threshold of delivering a minimum of 500 units in addition to social infrastructure. As such, none of these are suitable as site allocations.
<ul style="list-style-type: none"> <li>Land contamination should be a delivery consideration to ensure that appropriate assessments are carried out prior to development (Environment Agency)</li> </ul>	Minor change – additional wording will be included in the delivery considerations of the relevant site allocations.



## Appendix 3 Schedule of Minor Modifications

Ref	Part / section	Chapter/ Theme	Paragraph	Policy	Amendment (Deleted text shown as struck through and additional text shown in red)	Reason for change (Please note that references to representations refer to those received in response to the amendments to the proposed submission version of the Tower Hamlets Local Plan unless otherwise stated).
MM1	All chapters				Chapters to be reordered in chronological/numerical order: chapter 1,2,3,4,5 etc	For consistency and clarification
MM2	All sections				Parts 1 to 6 Rename: Sections 1 to 6	To aid ease of document use
MM3	List of figures				List of <del>F</del> figures	For consistency and clarification
MM4	List of figures				Insert a list of policies after the list of figures	To aid ease of document use
MM5	Consultation information				Delete this section	The consultation has now ended and is no longer applicable.
MM6	Part 1: Setting the scene	Chapter 1: Introduction			Insert the following paragraph between paragraphs 1.7 and 1.8 in section 1: <b>Part of the borough falls within the boundary of the London Legacy Development Corporation (as shown on figures 2 and 3). The Local Plan does not cover this area with the exception of waste matters, as detailed in chapter 10 in section 3. Local Plan designations within this area are shown on the Policies Map and Key Diagram and are identified in the London Legacy Development Corporation Local Plan which applies in this area.</b>	To respond to a representation from a statutory consultee
MM7	Part 1: Setting the scene	Chapter 2: Borough portrait			Chapter 2: Borough <del>P</del> portrait	For consistency and clarification
MM8	Part 1: Setting the scene	Chapter 2: Borough portrait	2.23		However, the overall provision of publicly accessible open space <del>in the borough</del> is low compared to other inner London boroughs with similar characteristics, as well as being far below national standards	For consistency and clarification
MM9	Part 1: Setting the scene	Chapter 2: Borough portrait	new paragraph after 2.11		Add new paragraph after 2.11: <b>While the majority of the borough's future housing and employment supply is expected to come forward on allocated sites, significant opportunities exist to bring forward development within other locations, such as small-scale infill sites within existing neighbourhoods and the intensification of existing brownfield sites. These sites (known as windfalls) have the potential to make a significant contribution to the supply of housing and employment land in the borough.</b>	Respond to a representation from a statutory consultee
MM10	Part 1: Setting the scene	Chapter 3: Trends	3.1: Our Infrastructure		Multiple projects are <b>also</b> underway or planned to improve the public transport network across the borough, including the new Elizabeth line, improvements to the London Underground (e.g. Central and Jubilee lines) and Docklands Light Railway, improved river services and additional river crossings. <b>However, Even with these capacity increases, future demand is forecast to outstrip supply over the plan period, Consequently, a and further investment significant step-change in future capacity-is will be required above that already planned. Tower Hamlets is expected to experience continued job gains and strong employment growth over the period to 2031 (in excess of London and national averages).</b>	Respond to a representation from a statutory consultee
MM11	Part 2: Vision and objectives	Chapter 1: Our vision for Tower Hamlets	Vision box		Neighbourhoods will be transformed with high quality buildings and well-designed spaces, while the character of the borough's 24 places that make Tower Hamlets unique, <b>including its cultural heritage</b> , will be protected and enhanced: ensuring a sensitive balance between, and integration of, old and new	Respond to a representation from a statutory consultee
MM12	Part 2: Vision and objectives	Chapter 2: Key objectives and principles	Amend key objective 1:		Growth must be delivered alongside <b>appropriate</b> social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported. <b>When taken as a whole</b> , growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development.	Respond to a representation from a developer / landowner
MM13	Part 2: Vision and objectives	Chapter 2: Key objectives and principles	Amend key objective 2:		6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, <b>intensification</b> , integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places. 7. maximising the benefits of the new Elizabeth line (including the stations at Whitechapel and Canary Wharf) <b>and other transport schemes, acting as a catalyst for investment;</b>	Respond to a representation from a developer / landowner
MM14	Part 2: Vision and objectives	Figure 5: Key diagram	key to figure 5		Change the key to figure 5 as follows. Delete " <del>New pedestrian/cycle bridge proposed</del> " and replace with " <b>New pedestrian/cycle river crossing - proposed</b> "	Typographical error
MM15	Part 3: Policies	All chapters			<del>D.DH7</del> <b>8: Amenit</b> y	Typographical error
MM16	Part 3	Chapter 2: Achieving sustainable growth		S.SG1: Areas of growth and opportunity within Tower Hamlets Part 2	Development <b>that is</b> within or part of a site allocation is required to deliver the identified land uses, infrastructure requirements and the design and delivery principles.	For consistency and clarification
MM17	Part 3: Policies	Chapter 2: Achieving sustainable growth	2.9		Each sub area (as shown on the <del>p</del> <b>Policies m</b> Map is distinctive.....	For consistency and clarification
MM18	Part 3: Policies	Chapter 2: Achieving sustainable growth		Policy S.SG1 Areas of Growth and opportunity within Tower Hamlets	3. The majority of new housing and employment provision within the borough will be focussed within the Isle of Dogs and South Poplar opportunity area, principally within Canary Wharf and <b>the area in the</b> north of the Isle of Dogs. Significant amounts of new housing will also be delivered in the City Fringe and Lower Lea Valley (including the Poplar Riverside Housing Zone) opportunity areas.	To respond to a representation from a local resident / community group

MM19	Part 3: Policies	Chapter 2: Achieving sustainable growth	2.1		The Local Plan also seeks to protect and enhance the character and distinctiveness of the borough's 24 places that make up each of the four sub-areas (see figure 4). Development within the sub-areas will be expected to have regard to the distinct characteristics of the borough's 24 places, as defined within the Tower Hamlets Urban Structure and Characterisation Study and other relevant guidance, such as conservation area appraisals, design guides, and supplementary planning documents <b>and the Tower Hamlets Conservation Strategy</b> .	To respond to a representation from a statutory consultee
MM20	Part 3: Policies	Chapter 2: Achieving sustainable growth		D.SG3: Health Impact Assessments	1. The following developments are required to complete and submit a <b>rapid</b> health impact assessment as part of the planning application. a. Major developments. b. <b>New</b> development within an area of sub-standard air quality (as shown on the Policies Map). c. Developments which contain any of the following uses:  i. Education facilities. ii. Health facilities. iii. Leisure or community facilities. iv. A5 uses (hot-food-takeaways). v. Betting shops. vi. Publicly accessible open space.	To respond to multiple representations
MM21	Part 3: Policies	Chapter 2: Achieving sustainable growth	2.22	D.SG3: Health Impact Assessments	2.22 Health impact assessments should be undertaken using the recommended guidance from our public health service. <del>(For example, the latest Healthy Urban Planning Checklist,</del> <b>which also provides a rapid health impact assessment tool (Healthy Urban Development Unit)</b> .	To respond to multiple representations
MM22	Part 3: Policies	Chapter 2: Achieving sustainable growth	2.19	D.SG3: Health Impact Assessments	2.19 Improving health and wellbeing in the borough is a key priority in our Community Plan, reflecting the borough's significantly high levels of poor health outcomes. This policy seeks to address high levels of poor health in the borough, which environmental improvements, <b>including the principles of active travel, active design and healthy streets</b> , can help to reduce".  *New footnote: <b>Further details on the borough's health profile and priorities and the links between health and the built environment can be found in the Tower Hamlets Joint Strategic Needs Assessment: Planning and Health (2016) and the Tower Hamlets Health and Wellbeing Strategy (2017)</b> .	To respond to a representation from a developer / landowner
MM23	Part 3: Policies	Chapter 2: Achieving sustainable growth	2.31	D.SG4: Planning and construction of new development	2.31 Cumulative impacts arising from <b>the construction phase of</b> other major developments <del>building-works</del> with one kilometre radius...	To respond to a representation from a developer / landowner
MM24	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH1: Part 1c	<del>reflects</del> <b>have regard to</b> their immediate and wider surroundings.	Multiple representations
MM25	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH1: Part 1d	Delete part 1d. <del>reuse existing buildings with better quality design where feasible and where it would not compromise the quality of the development;</del> and re-name 1e-j accordingly in policy and supporting paragraphs	Multiple representations
MM26	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH1: Part 1f	<del>including residential development and social housing.</del>	Respond to a representation from a local resident/community group
MM27	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH1: Part 1g	well-connected, <b>inclusive</b> and integrated spaces	Respond to a representation from a local resident/community group
MM28	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH1: Part 1j	Provide a mix and range of publicly accessible open spaces <b>and water spaces</b> that promote biodiversity, health and well-being.	For clarification, accuracy and consistency.
MM29	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.4	S.DH1 supporting text	<del>Delivering high quality design lies at the heart of our plans to grow and expand Tower Hamlets, helping to ensure it will help to ensure that Tower Hamlets remains one of the most attractive and dynamic parts of London.</del> ...benefit Tower Hamlet's' location (move apostrophe)	For clarification, accuracy and consistency.
MM30	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.4	S.DH1 supporting text	The purpose of this policy is to outline the key elements of high quality design so that we create buildings, spaces and places that are sustainable, accessible, attractive, durable and well-integrated into their surroundings and <b>that</b> are sensitive to the character of the area, <b>thus</b> contributing to a <b>better</b> high quality of life <b>and well-being</b> .	For clarification, accuracy and consistency.
MM31	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.12	S.DH1 supporting text	Part j seeks to promote the provision of open spaces <b>and water spaces</b> in the borough	For clarification, accuracy and consistency.
MM32	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH2: Part 1a	1(a) improving connectivity to public transport hubs, town centres, open spaces, <b>water spaces</b> , social and community facilities and surrounding areas	For clarification, accuracy and consistency.



MM33	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.17	D.DH2 supporting text	main streets - focusing on movement and prioritising the safe and convenient flow of buses, and cyclists and pedestrians;	Respond to a representation from a statutory consultee
MM34	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.20	D.DH2 supporting text	integral development component	Typographical or graphical error
MM35	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.21	D.DH2 supporting text	signage, and lighting and public art	Respond to a representation from a developer/landowner
MM36	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.24	D.DH2 supporting text	Balconies overhanging on the public footway	Typographical or graphical error
MM37	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Policy links (p39)	D.DH2	Policy S.OWS1: Creating a network of open spaces	Typographical or graphical error
MM38	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Policy links (p39)	D.DH2	Insert policy link: Policy D.OWS4: Water spaces	Respond to a representation from a statutory consultee
MM39	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Glossary		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.	Respond to a representation from a developer/landowner
MM40	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH3: Part 1	Proposals must preserve conserve or where appropriate enhance the borough's historic designated and non-designated heritage assets	Respond to a representation from a statutory consultee
MM41	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH3: Part 2	an historic a heritage asset	Respond to a representation from a statutory consultee
MM42	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH3: Part 2d	they preserve strategic and locally important views and landmarks,	For clarification, accuracy and consistency.
MM43	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH3: Part 2e	carried out -outlining (delete extra space)	Typographical or graphical error
MM44	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		S.DH3: Part 9	nationally important remains to be preserved conserved permanently at the site in situ,	Respond to a representation from a statutory consultee
MM45	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.27	S.DH3	as well as London as a whole through their individual and group value.	Respond to a representation from a statutory consultee
MM46	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.29	S.DH3	...developments will need to demonstrate an understanding of the significance of the relevant asset or its setting, including the contribution setting makes to its significance, as part of the planning application process. It should also include an assessment of group value, as well as the individual significance of heritage assets. As a minimum, this should include both desktop analysis and on-site investigation, with reference to the Greater London Historic Environment Record and other relevant documentation.	Multiple representations
MM47	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.30	S.DH3	heritage assets	Typographical or graphical error
MM48	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Paragraph 3.36	S.DH3	consider how they can be preserved conserved or enhanced	Respond to a representation from a statutory consultee
MM49	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH4: Part 1	Part 1. backdrop of such -views (delete extra space) Part 1(b). (as defined as on the Policies Map)	Typographical or graphical error
MM50	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.44	D.DH4	strategic views identified in the latest versions of the London Views Management Framework and Tower Hill of London and Maritime Greenwich Meantime World Heritage Site Management Plans	Respond to a representation from a statutory consultee
MM51	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.47	D.DH4	Insert at end of paragraph 3.47: New developments are expected to make a positive contribution to the skyline, including in their use of palette and texture, in particular where these buildings will have an impact on long-distance views.	Respond to a representation from a statutory consultee
MM52	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.51	D.DH4	Insert after unique places. These will be identified on a case by case basis through the townscape analysis in relation to a particular development.	Multiple representations
MM53	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.51	D.DH4	(see policy D.DH6)	Typographical or graphical error
MM54	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Evidence links	D.DH4	London View Management Framework (Mayor of London, 2012)	For clarification, accuracy and consistency.
MM55	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Evidence links	D.DH4	Maritime Greenwich World Heritage Site Management Plan	Respond to a representation from a statutory consultee

MM56	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Evidence links	D.DH4	<a href="#">Tower Hamlets Water Spaces Study (2017)</a>	Insert reference to relevant evidence base
MM57	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Figure 7	D.DH4	St Paul's Cathedral is a strategically important landmark (not a borough designated landmark) Map: purple star Legend: <del>Tower of London</del> : Sstrategically important landmarks	Typographical or graphical error
MM58	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Figure 7	D.DH4	<a href="#">Update policies map to reflect numbering and labels in Figure 7 of borough designated views</a>	Respond to a representation from a developer/landowner
MM59	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH5	2. Proposals affecting the wider setting of the Tower of London and Maritime Greenwich or <del>those would impinging</del> upon strategic or other significant views to or from these sites	For clarification, accuracy and consistency.
MM60	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.55	D.DH5	(including the <del>Queen's House, Royal Palace, Royal Hospital and</del> the Royal Observatory <del>and the Old Royal Naval College</del> )	Respond to a representation from a statutory consultee
MM61	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.58	D.DH5	Full stop at end of paragraph	Typographical or graphical error
MM62	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Footnote 15	D.DH5	Delete extra space between traditions...or	Typographical or graphical error
MM63	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Evidence links	D.DH5	<a href="#">Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS, January 2011)</a>	Respond to a representation from a statutory consultee
MM64	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6 Tall buildings Part 1 and 1b.	1. Developments with tall buildings <del>are required to</del> <b>must be of exceptional architectural quality. To achieve this, proposals must:</b>	For clarification, accuracy and consistency.
MM65	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6 Tall buildings Part 1a.	<del>and in keeping with</del> <b>take account of</b> the character of the immediate context and of their surroundings;	Multiple representations
MM66	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6 Tall buildings Part 1b.	<del>b. achieve exceptional architectural quality and</del> using robust and durable materials <del>integrated at all angles of</del> <b>throughout</b> the building.	Multiple representations
MM67	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6 Tall buildings Part 1j.	and amenity of the <del>proposal site and the surrounding area</del>	For clarification, accuracy and consistency.
MM68	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6 Tall buildings Part 1i.	...television and radio transmission networks <del>and river radar equipment.</del>	Respond to a representation from a statutory consultee
MM69	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6 Tall buildings Part 2.	Aldgate principles: <del>Tall buildings should actively increase the quality and extent of the public realm in this area.</del>	For clarification, accuracy and consistency.
MM70	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6 Tall buildings Part 2.	Canary Wharf (Isle of Dogs) principles: 1) <del>Individual buildings should be integrated into urban super blocks set in the public realm. Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square.</del> Building heights within the Canary Wharf cluster should drop away from the central location at <b>+ One</b> Canada Square.	For clarification, accuracy and consistency.
MM71	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6: Tall buildings Part 2.	Millwall Inner Dock (Isle of Dogs) principles: 1) Insert space between first and second bullet points. 2) <del>Building heights should step down away from the centre of the cluster.</del> <b>Proposals must</b> ensure that the integrity of the Canary Wharf cluster is retained in the skyline...	Typographical error (check whole document)
MM72	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6: Tall buildings Part 2.	Blackwall principles: 1) Development heights should step down towards the edge of this zone <del>cluster</del> . <del>The cluster must be subservient and separate from the nearby Canary Wharf cluster and buildings should be of varying heights allowing sky views between them when viewed from the river or the Greenwich Peninsula.</del> 2) The cluster must be subservient and separate from the nearby Canary <del>W</del> wharf cluster and buildings should be of varying heights allowing sky views between them when viewed from the river or the Greenwich <del>P</del> peninsula.	Typographical error/for clarification
MM73	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH6: Tall buildings Part 3c/d.	c. unlock significant infrastructure constraints; <del>and/or</del> <del>d. deliver significant additional publicly accessible open space.</del>	Multiple representations
MM74	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.65		An architectural model may be required depending on the scale and nature of the proposal, <b>including an assessment of the cumulative impact of nearby proposals with valid planning permission.</b>	Respond to a representation from a developer/landowner
MM75	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.66		<del>privacy and sense of ownership.</del>	For clarification (not related to assessment of impacts on microclimate)
MM76	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.67		Proposals involving <del>tall</del> buildings (90 metres in height or greater) must be referred to the Civil Aviation Authority and London City Airport... (delete parentheses)	Respond to a representation from a developer/landowner

MM77	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Figure 9		CLUSTER PRINCIPLE TWO: Tall buildings outside <b>but within the vicinity</b> of the cluster are not desirable CLUSTER PRINCIPLE FOUR: Tall buildings in the foreground of the clusters should not break the silhouette of this cluster when seen from the <b>southern bank of the</b> Thames riverfront	For clarification, accuracy and consistency/respond to a representation from a developer/landowner
MM78	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.72		Insert at end of paragraph 3.72: <b>Proposals for tall buildings on the edge or within the vicinity of tall building zones will be expected to follow the step down approach from the cluster to avoid the merging of clusters.</b>	For clarification, accuracy and consistency.
MM79	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.74		In such locations, tall buildings will be expected to serve as landmarks and unlock significant <b>strategic</b> infrastructure provision (in particular <del>the provision of</del> publicly accessible open space <del>and social and community facilities</del> , <b>new transport interchanges, river crossings and educational and health facilities serving more than the immediate local area</b> ) to address <b>existing</b> deficiencies <del>within the area</del> and <b>future needs</b> (as identified in the Infrastructure Delivery Plan, the Regulation 123 List and other relevant strategies)	Multiple representations
MM80	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.75		Additional text at the end of paragraph 3.75: <b>This includes proposals involving tall buildings located within site allocations where these are considered to be appropriate and in line with relevant policies.</b>	Respond to a representation from a developer/landowner
MM81	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH4, D.DH5 & D.DH7	Insert references to the Tower Hamlets Conservation Strategy under the "Evidence links" box in relation to policies D.DH4 (Shaping and managing views), D.DH5 (World heritage sites) and D.DH7 (Tall buildings).	Typographical or graphical error
MM82	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Evidence links	5	<b>London Borough of Tower Hamlets: Conservation Area Character Appraisals and Management Guidelines</b>	For clarification, accuracy and consistency.
MM83	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Evidence links	D.DH6	<b>London View Management Framework (Mayor of London, 2012)</b>	For clarification, accuracy and consistency.
MM84	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Glossary	D.DH6	Tall buildings: Any building that is significantly taller than <del>their surroundings</del> <b>its local context</b> and/or <b>have</b> has a significant impact on the skyline. <b>Within the borough, buildings of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is less) will be considered to be a tall building.</b>	For clarification, accuracy and consistency.
MM85	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Glossary	D.DH6	<b>Urban super block: An urban block created by one large building surrounded by streets.</b>	Multiple representations
MM86	Part 3: Policies	Chapter 3: Creating attractive and distinctive places		D.DH7	1. Residential development should be consistent with the guidelines set out in the London Plan. Where higher density development is proposed, it must demonstrate that: a) the cumulative impacts of the proposed development have been considered, <b>it does and do</b> not result in over-development <b>or and</b> that suitable mitigation measures in relation to design and infrastructure have been identified; and	Multiple representations
MM87	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.76	D.DH7	Many proposed developments in the borough are seeking to exceed the highest density levels <b>currently</b> set out in the London Plan's density range.	Multiple representations
MM88	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.77	D.DH7	In order to manage this, the policy requires that developments in excess of the London Plan density <b>guidelines</b> should consider the cumulative effects from development..	Multiple representations
MM89	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.78	D.DH7	<b>For instance, this may be where a development necessitates a change in the management of existing infrastructure, or where it requires substantial capital investment to address additional demand created by the development.</b>	For clarification
MM90	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.79	D.DH7	Where the London Plan density <del>range</del> <b>guidelines</b> are exceeded, schemes must be of exemplary design quality and must address the <del>issues-</del> <b>cumulative impacts</b> that can be associated with high density development, such as noise, disturbance, <b>highways implications, loss of outlook</b> and overlooking. In addition, developers should consider the capacity of infrastructure and services to accommodate the development including potential mitigation measures to <b>provide additional capacity and</b> unlock any identified constraints.	Multiple representations
MM91	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.80	D.DH7	Developers are expected to <del>include</del> <b>reference</b> in their planning application the relevant London Plan density <b>range guidance</b> for their site and the actual net residential density proposed.	Multiple representations
MM92	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.91	D.DH8	development should refer to the most <del>recent version of the government's</del> <b>up-to-date</b> guidance <b>and/or best practice</b> on the control of odour and noise from commercial kitchen exhaust systems.	For clarification, accuracy and consistency.
MM93	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	Evidence links	D.DH8	<del>Control of odour and noise from commercial kitchen exhaust systems (Department for Environment, Food and Rural Affairs, 2011)-</del>	For clarification, accuracy and consistency.
MM94	Part 3: Policies	Chapter 3: Creating attractive and distinctive places	3.94	D.DH9	Shopfront design should be an integral part of the design process with consideration given to how security measures are incorporated <b>to maintain active frontages at all times.</b>	Respond to a representation from a developer/landowner
MM95	Part 3: Policies	Chapter 4: Meeting housing needs	Footnote 18 linked to paragraph 4.7		Please note: <b>figure 10 is a spatial representation of the Local Plan housing supply outlined in table 1 and provided in greater detail in appendix 7. Due to how the data is available</b> the distribution of growth is based around ward boundaries <b>and is therefore indicative.</b>	To respond to multiple representations
MM96	Part 3: Policies	Chapter 4: Meeting housing needs	4.8		While there <del>is will</del> be a <b>currently identified</b> shortfall towards the end of the plan period, we are committed to working with our partners (including the Greater London Authority) to maximise housing supply within the parameters of <b>sustainable development and address this unmet need.</b>	Typographical error

MM97	Part 3: Policies	Chapter 4: Meeting housing needs	4.1		If our targets are not being met, we will undertake a review of the Local Plan to explore ways of addressing this unmet need, taking into account the outcomes of future revisions to the London Plan and opportunities to increase the supply of housing as detailed in section 5 below .	Typographical error
MM98	Part 3:Policies	Chapter 4: Meeting housing needs	4.14		Housing growth will be primarily delivered in the locations specified in part 1 (a) via a number of different mechanisms: the regeneration of previously developed land, intensification of the built form in opportunity areas, highly accessible locations along transport corridors, and the delivery of site allocations. A smaller proportion of housing will be delivered through town centre intensification, estate regeneration and infill development, bringing back long term vacant properties into residential use and windfall sites. Further details can be found in sections 4 and 5 .	To respond to a representation from a statutory consultee
MM99	Part 3:Policies	Chapter 4: Meeting housing needs	4.18		Add the following wording to this paragraph: Applications that do not meet policy requirements will be subject to viability re-appraisals. Further guidance is provided in the Development Viability Supplementary Planning Document.	To respond to multiple representations
MM100	Part 3:Policies	Chapter 4: Meeting housing needs	4.21		Part 2 (c e) seeks ...	Typographical error and to address reps: LP334; LP514; LP290; LP402
MM101	Part 3:Policies	Chapter 4: Meeting housing needs	4.21		All residential developments, excluding student and specialist housing (which are addressed in policies D.H6 and D.H4	To address reps: LP514; LP665
MM102	Part 3:Policies	Chapter 4: Meeting housing needs	4.22		Part 2 (d e) demonstrates ...	Typographical error and to respond to multiple representations
MM103	Part 3:Policies	Chapter 4: Meeting housing needs	Evidence Links (for policy S.H1)		<ul style="list-style-type: none"> <li>• Planning Obligations Supplementary Planning Document (Tower Hamlets)</li> <li>• Tower Hamlets Housing Strategy (2016)</li> <li>• Good Practice Guide to Estate Regeneration (GLA, 2016)</li> <li>• Development Viability Supplementary Planning Document (Tower Hamlets)</li> </ul>	To respond to multiple representations
MM104	Part 3:Policies (and throughout document wherever referenced)	Chapter 4: Meeting housing needs		Policy D.H2: Affordable housing	Change policy name: Policy D.H2: <del>Mixed and balanced communities Affordable housing</del>	To clarify policy focus and address multiple representations
MM105	Part 3:Policies	Chapter 4: Meeting housing needs	4.28	Policy D.H2: Affordable housing	The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs. As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b) will be calculated using habitable rooms.	To respond to multiple representations
MM106	Part 3: Policies	Chapter 4: Meeting housing needs		Policy D.H2	<p>5. Estate regeneration development schemes are required to:</p> <p>a. protect and enhance existing open space and community facilities;</p> <p>a. b. protect the existing quantum of affordable and family units, with affordable units re-provided with the same or equivalent rent levels.;</p> <p>b. c. provide an uplift in the number of affordable homes; and</p> <p>e. d. bring existing homes up to the latest decent homes standard.</p>	Typographical error and to address reps: LP552; LP658;
MM107	Part 3: Policies	Chapter 4: Meeting housing needs	4.38	Policy D.H2	Housing estates in the borough provide a large number of affordable homes, as well as much valued open space and community facilities. Pa	Typographical error in policy resulted in wrong reference in supporting text.

MM108	Part 3: Policies	Chapter 4: Meeting housing needs		Policy D.H2	<p>2. Development is required to maximise the delivery of affordable housing on-site.</p> <p>a. Affordable housing calculations will be based on habitable rooms.</p> <p>b. Off-site affordable housing will only be considered in circumstances where it:</p> <p>i. is not practical to provide affordable housing on-site;</p> <p>ii. does not result in an over-concentration of one type of housing in any one local area to ensure mixed and balanced communities;</p> <p>iii. can provide a minimum of 50% affordable housing overall, subject to viability; and</p> <p>iv. can provide a better outcome for all of the sites, including a higher level of <b>affordable</b> rented family homes.</p>	Clarification and to respond to representations from developers/ landowners
MM109	Part 3: Policies	Chapter 4: Meeting housing needs		Policy D.H3:Housing standards and quality	<p>1. Development is required to demonstrate that, <del>a</del> <b>as a minimum, it meets with the most up-to-date London Plan space and accessibility standards; in particular:</b></p> <p><del>b</del> <b>a.</b> it provides a minimum of 2.5 metres floor-to-ceiling heights; and</p> <p><del>c</del> <b>b.</b> at least 10% of <del>new homes are designed to be suitable for occupation by a wheelchair user or could easily be adapted for occupation by a wheelchair user.</del> <b>new homes are designed to be suitable for occupation by a wheelchair user or could easily be adapted for occupation by a wheelchair user. 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.</b></p> <p><del>i.</del> <b>Where wheelchair accessible u-</b> <b>Units which meet the wheelchair user dwellings standards M4 (3) (2) (b) are to be delivered above the ground floor, access to a second lift must be provided.</b></p> <p><del>ii.</del> <b>In exceptional circumstances, where units which meet the user dwellings standards M4(3) wheelchair units cannot be accommodated on site, contributions in-lieu will be accepted.</b></p>	To respond to multiple representations, including from a statutory consultee
MM110	Part 3: Policies	Chapter 4: Meeting housing needs	4.41 and 4.42	Policy H3:Housing standards and quality	<p>4.41 Part 1 (a and b) seeks to ensure all housing development provides adequate internal space to meet relevant space, accessibility and amenity standards and provide an appropriate living environment. It requires development to comply, as a minimum, with the space and accessibility standards set out in the London Plan (GLA, 2016) and the Housing Supplementary Planning Guidance (GLA, 2016), whilst having regard to the particular needs of residents in the borough as well as the increasingly dense character of the built form. If the GLA's space and accessibility standards are updated, we may seek to implement these changes, so long as they are locally suitable. We strongly urge developers/applicants to provide evidence of how the scheme will achieve high quality design in line with the Home Quality Mark standards.</p> <p>4.42 In order to implement part 1 (e b) and meet standards in the Housing Supplementary Planning Guidance (GLA, 2016), 10% of all new units across all tenures should be wheelchair <del>user dwellings accessible or wheelchair-adaptable</del>, but this may be varied to at least 10% of habitable rooms where a better outcome is provided in terms of delivery of larger units. <del>All wheelchair units in the affordable tenure should be wheelchair accessible (not adaptable).</del> <del>All 'wheelchair user dwellings' (the M4(3) standard) in the affordable rented tenure should meet the 'adaptable' category standards within the M4(3) standard.</del> <b>It is expected that units which meet the wheelchair accessible user dwellings standards M4(3) units above the ground floor will be provided with access to a second lift for use when the primary lift is not functioning. We have a preference that units which meet the wheelchair-accessible user dwellings standards M4(3) will be provided below the fifth floor due to difficulties allocating wheelchair accessible units on higher floors. In some circumstances, site constraints (such as the inability to secure sufficient accessible parking, lack of lift circulation space and restrictions on ground floor residential uses) could lead to applicants arguing that units which meet the wheelchair accessible user dwellings standards M4(3) may not be able to be delivered on site. In these circumstances, we may accept payments in lieu of the provision of units which meet the wheelchair accessible user dwellings standards M4(3) through the 'Project-120' scheme.</b></p>	To respond to multiple representations, including from a statutory consultee
MM111	Part 3: Policies	Chapter 4: Meeting housing needs	Footnote 33 on paragraph 4.42	Policy H3:Housing standards and quality	<p>33. We are working with the borough's development partners to ensure that new homes for wheelchair users are designed to meet the specific needs of families on the <del>affordable</del> <b>accessible</b> housing register and thereby reduce the number of tenants requiring specifically adapted wheelchair accessible homes and the length of time they have been waiting to secure a suitable home.</p>	Typographical error
MM112	Part 3: Policies	Chapter 4: Meeting housing needs	4.44 and 4.43	Policy D.H3:Housing standards and quality	<p>4.43 Part 2 provides guidance that private and affordable housing should not be distinguishable. Different tenures should be mixed throughout a development, although it is recognised that separate cores may be required to enable effective management <b>and minimise service charges for affordable units.</b> <del>Where separate cores result in separate entrances for market and affordable units, these entrances must also not be externally distinguishable and must be located so that they are of equivalent access and amenity value.</del></p> <p>4.44 Part 3 recognises that due to higher occupancy rates and child yields, affordable housing is likely to be subject to more wear and tear than other housing tenures. In order for these homes to be fully fit for purpose, developers must use hard-wearing, durable materials to ensure <b>the development remains of high quality throughout its lifetime and requires minimal service charges to clean and maintain.</b> This should be evidenced in the design and access statement. In addition, all family-sized affordable homes should have separate kitchens and living rooms, due to local needs. For further guidance, please contact our affordable housing service and/or refer to the Tower Hamlets Housing Forum's Section 106 Design Guide.</p>	To respond to representations from a developer / landowner and local residents / community group
MM113	Part 3: Policies	Chapter 4: Meeting housing needs	4.44		<p><b>In order to be fully fit for purpose</b></p>	To respond to a representation from a developer / landowner

MM114	Part 3: Policies	Chapter 4: Meeting housing needs	4.46	Policy D.H3:Housing standards and quality	4.46 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. <b>In relevant areas, developments should also be guided by policy D.ES2 (air quality) in relation to the layout and design of amenity space.</b>	To respond to a representation from a developer / landowner
MM115	Part 3: Policies	Chapter 4: Meeting housing needs		Policy D.H6: Student housing	1. Proposals involving new purpose-built student accommodation should be directed to locations which are within close proximity to the borough's higher education institutions <b>and or</b> in highly accessible locations and must	To respond to representations from developers/ landowners
MM116	Part 3: Policies	Chapter 4: Meeting housing needs	4.65	Policy D.H7: Housing with shared facilities (houses in multiple occupation)	...accommodation modelled on student housing but available for a wider range of occupants <b>or accommodation described as 'co-living'.</b>	To respond to representations from developers/ landowners
MM117	Part 3: Policies	Chapter 5: Delivering economic growth		Policy S.EMP1	Policy S.EMP1: Creating investment and jobs	For clarification, accuracy and consistency
MM118	Part 3: Policies	Chapter 5: Delivering economic growth		Policy S.EMP1	Canary Wharf <b>(as illustrated on the Policies Map)</b>	For clarification, accuracy and consistency
MM119	Part 3: Policies	Chapter 5: Delivering economic growth		Policy S.EMP1	<p><b>Primary Preferred Office Location (POL)</b> This predominantly consists of offices <b>and other strategic Central Activities Zone (CAZ) uses</b>, and is most suitable for buildings with large floor-plates which can provide significant numbers of jobs. It is unsuitable for housing or any other use which could undermine its function and prevent the delivery of sufficient land for employment use.</p> <p><b>Secondary Preferred Office Location (POL)</b> These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. <b>Significant Greater</b> weight is given to office and other strategic <b>CAZ Central Activities Zone</b> uses as a first priority. Although residential uses can be accommodated, these <b>must should</b> not exceed 25% of the site area <b>floorspace</b>, <b>and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</b></p> <p><b>Central Activities Zone (Zone-tertiary area)</b> This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Primary and Secondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for <b>some larger purpose-built office buildings</b> and significant provision of office and other <b>strategic CAZ uses</b> employment uses as part of <b>employment-led or mixed-use schemes</b>. <b>Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations; Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</b></p> <p><b>Tower Hamlets Activity Areas (THAA) &amp; designated town centres</b> The Tower Hamlets Activity Areas, District Centres and larger Neighbourhood Centres also provide opportunities for purpose-built office buildings with ground-floor retail and leisure uses. The activity areas in particular have the potential to accommodate substantial employment growth to support the strategic role of the <b>neighbouring CAZ and Primary and Secondary POLs and other parts of the CAZ.</b></p>	Multiple representations
MM120	Part 3: Policies	Chapter 5: Delivering economic growth		Policy S.EMP1	Insert the following new criterion after 1. <b>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</b>	Multiple representations
MM121	Part 3: Policies	Chapter 5: Delivering economic growth		Policy S.EMP1	Change parts 2 and 3 to 3 and 4 - given addition of new part above.	For clarification, accuracy and consistency
MM122	Part 3: Policies	Chapter 5: Delivering economic growth	5.11		The Central Activities Zone (CAZ) and the north of the Isle of Dogs (including Canary Wharf) has been subdivided into three distinct <b>areas zones(41)</b> . Commercial core areas ( <b>zone-A Primary POL</b> ) are deemed to be unsuitable locations for housing or other uses which would undermine the strategic functions of the CAZ and the north of Isle of Dog <b>(42)</b> . Employment and defined strategic functions/uses must be given greater weight than residential <b>zone-B-Secondary POL</b> or equal weight to residential use ( <b>tertiary areas within the CAZ-zone C</b> — <b>which only applies within the CAZ</b> ).	For clarification, accuracy and consistency
MM123	Part 3: Policies	Chapter 5: Delivering economic growth	5.12		Part 1 of the policy identifies the borough's Primary POL ( <b>zone-A</b> ) which corresponds with the "commercial core area" of the north of the Isle of Dogs.	For clarification, accuracy and consistency
MM124	Part 3: Policies	Chapter 5: Delivering economic growth	5.13		The Secondary POL ( <b>zone-B</b> ) covers parts of the City Fringe and north of the Isle of Dogs. These areas are also key existing or potential employment locations with offices and other strategic functions as the dominant land use. However, in contrast to the Primary POL, residential uses will be acceptable so long as they do not undermine the supply of offices and other strategic uses, <b>and do not utilise more than 25% of the proposed site area.</b> This approach seeks to ensure residential development does not prejudice the future intensification of employment floorspace or undermine the predominant employment function of these areas. This will help to achieve a sensitive transition <b>between the Primary POL and surrounding areas.</b>	For clarification, accuracy and consistency



MM125	Part 3: Policies	Chapter 5: Delivering economic growth	5.14		The remainder of the CAZ which is outside of the Secondary POL ( <del>the CAZ tertiary area zone C</del> ) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace <del>or other strategic CAZ uses</del> relative to the surrounding context of the site, although <del>(a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</del>	Multiple representations
MM126	Part 3: Policies	Chapter 5: Delivering economic growth	5.19 and 5.20		Change Part 2 and Part 3 to Part 3 and Part 4 as a result of an additional part being added to this policy.	For clarification, accuracy and consistency
MM127	Part 3: Policies	Chapter 5: Delivering economic growth	Figure 11		Key Update: Central Activities Zone (Zone C)- <del>tertiary area</del> Town / District / <del>Neighbourhood</del> Centres  Map update: Add South Quay Neighbourhood Centre to the map.	Typographical or graphical error
MM128	Part 3: Policies	Chapter 5: Delivering economic growth		D.EMP2	1. New or intensified employment floorspace will be supported within designated employment areas <del>locations</del> , and the Tower Hamlets Activity Areas, <del>as set out in policy S.EMP1 - and identified site allocations.</del> 2. Outside of these <del>locations cited in part 1 designated employment areas and Tower Hamlets Activity Areas</del> , new employment space will be directed to <del>designated town centres and accessible locations along major transport routes.</del>	Respond to a representation from a developer / landowner
MM129	Part 3: Policies	Chapter 5: Delivering economic growth	5.21		Part 1 of the policy encourages the provision of additional employment floorspace to meet demand and the needs of different business types. Where new provision is proposed, it must be located in the most viable locations to support the role and function of the borough's designated employment areas and to proactively avoid long-term vacancy or subsequent conversion to other uses. This policy seeks to direct new provision to the designated employment areas <del>activity areas and site allocations which include employment space</del> as a first priority, then to locations of highest activity, accessibility and visibility (see part 2) and finally to other locations (see part 3) where it meets strict criteria.	Respond to a representation from a developer / landowner
MM130	Part 3: Policies	Chapter 5: Delivering economic growth	5.24		Part 4 seeks to ensure that major development (i.e. <del>W</del> hich comprises of at least 1,000 square metres of <del>gross</del> commercial floorspace <del>relating to retail, employment or leisure uses</del> ) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such cases, applicants should provide evidence of agreement to let the workspace 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. Applicants should work with <del>our employment and enterprise team</del> and recognised affordable workspace providers (for which we hold an approved list) <del>to agree appropriate terms of affordability on a case by case basis</del> , providing details of management arrangements. <del>As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms.</del>	Multiple representations
MM131	Part 3: Policies	Chapter 5: Delivering economic growth	5.25		For example, development should provide sufficient cycle spaces, appropriate levels of natural light and a range of shared services and facilities appropriate to the size and scale of the unit (such as communal breakout spaces, kitchen areas, showers and childcare facilities) <del>which do and</del> not detract from the visual appearance of the development or its surroundings.	For clarification, accuracy and consistency
MM132	Part 3: Policies	Chapter 5: Delivering economic growth		D.EMP3	1. Development resulting in the net loss of existing employment floorspace <del>or potential sites</del> within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. Development should not result in the <del>net</del> loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they:	For clarification, accuracy and consistency
MM133	Part 3: Policies	Chapter 5: Delivering economic growth	5.3		It is recognised that, in some cases, requiring 24 months marketing evidence may be counterproductive to enhancing local character if the condition of the property is such that attempting to let it would be unrealistic. In such cases, the applicant should submit a detailed report on the history and condition of the property to robustly justify why marketing evidence should not be required and that reprovided employment space as part of redevelopment would not be viable. It should <del>also</del> be demonstrated that the proposed development would not prejudice wider land-use objectives or the delivery of site allocations, and that reverse-sensitivity issues would not arise through conflict with surrounding existing uses, particularly where it lies within a cluster of other employment uses. <del>The report should also demonstrate that the benefits of an alternative use would outweigh the benefits of the employment use to meet other local plan objectives, such as the need for complimentary town centres uses or to maintain active frontages within town centres.</del>	Respond to a representation from a developer / landowner
MM134	Part 3: Policies	Chapter 5: Delivering economic growth		D.EMP4	2. Redevelopment within the Secondary POL must be employment-led and deliver the maximum viable level of office floorspace, or other non-residential strategic functions within the Central Activities Zone (CAZ). Where residential uses are proposed these should not exceed the proportion set out in policy S.EMP 1. 3. Redevelopment within the CAZ ( <del>zone C tertiary area</del> ) should be <del>employment-led</del> or mixed-use to include office or other non-residential floorspace that supports the strategic function of the CAZ. <del>Residential uses are supported as part of mixed used schemes although (</del> The proportion of residential floorspace should not exceed <del>that set out in policy S.EMP 1. 50% of the total floorspace within the development proposal.</del>	Multiple representations



MM135	Part 3: Policies	Chapter 5: Delivering economic growth	5.33		Parts 2 and 3 seek to strike an appropriate balance between offices, CAZ strategic uses and housing to meet future growth needs and the place-making objectives of mixed-use development. <del>Any redevelopment proposals within the Secondary POL and CAZ tertiary area (zone C), any redevelopment proposals should result in an overall increase in employment floorspace and should meet the office floorspace proportions required in policy S.EMP1. (see paragraphs 5.13 and 5.14). Where development seeks to deviate from these policy requirements, applicants must provide robust justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation.</del>	For clarification, accuracy and consistency
MM136	Part 3: Policies	Chapter 5: Delivering economic growth	5.34		<del>Parts 2 and 3 seek to strike an appropriate balance between the protection of existing and provision of new office and CAZ strategic uses to meet future growth within with demand for new housing and place-making objectives of delivering mixed-use development. Within the Secondary POL and CAZ (zone C), there should be an overall increase in employment floorspace as a result of any redevelopment proposal. Where there is deviation below the 75% and 50% proportions of office floorspace, applicants must provide robust justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation.</del>	Typographical or graphical error
MM137	Part 3: Policies	Chapter 5: Delivering economic growth	5.35-5.38		Update paragraphs 5.35 - 5.38 due to deleted paragraph.	For clarification, accuracy and consistency
MM138	Part 3: Policies	Chapter 6: Revitalising our town centres	6.2		<del>They also underpin Council our Sstrategic Mmission as set out in the Tower Hamlets Town Centre Strategy (2017 – to 2022) to “create places that are at the heart of the community, celebrate local heritage and improve health and well being” and to “improve the attractiveness, appeal and ease of use to make each of our Ttown Ccentres more in tune with the shopping and leisure needs of local residents and visiting consumers”.</del>	For clarification, accuracy and consistency
MM139	Part 3: Policies	Chapter 6: Revitalising our town centres		S.TC1	4c. promoting mixed-use and multi-purpose town centres (which include new residential uses where appropriate) with a mix of unit sizes and types to assist in the creation of vibrant centres that offer a diversity of choice, and meet the needs of local communities;	For clarification, accuracy and consistency
MM140	Part 3: Policies	Chapter 6: Revitalising our town centres		D.TC2	4. Outside of the Primary and Secondary Frontages within the District Centres, uses that do not require high levels of footfall (e.g. offices) and supporting town centre functions will be supported alongside retail uses.  6. Where the loss of A1 retail units is proposed within the boundary of a town centre, it must demonstrate that: a. the loss of the A1 units would not result in the overall level of A1 units falling below the proportions set out within policy D.TC2 (see parts 1, 23 and 45) (unless there is robust evidence confirming that the proportions of A1 floorspace cannot be maintained at the current level); and a. individual units do not exceed 200 square metres; b. shop fronts are well integrated into their surroundings and are implemented upon completion of the development; and c. the role of nearby town centres is not undermined.	Multiple representations
MM141	Part 3: Policies	Chapter 6: Revitalising our town centres		D.TC3	2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same criteria and additionally: a. demonstrates local need that cannot be met within an existing designated centre; and b. does not affect amenity or detract from the character of the area.  2. Development resulting in the loss of A1 shops retail outside of the town centre hierarchy will only be supported where: a. the shop is within a 300 metres walking distance of the nearest alternative A1 shops; or b. the shop has been vacant for a period of more than 12 months and robust evidence is provided of efforts made to market the shop unit over that period at an appropriate rent (providing examples of three comparable shop unit rents within the vicinity); or c. the site is unsuitable for continued retail use due to its accessibility, size or condition and there is no viable prospect of a retail use on the site, taking account of the projected residential growth in the vicinity and future need for provision of local shops as part of a sustainable neighbourhood.	Multiple representations
MM142	Part 3: Policies	Chapter 6: Revitalising our town centres	6.31		<del>New retail development will continue to be directed towards existing centres in accordance with the sequential approach set out in the National Planning Policy Framework (NPPF) which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas. (see part 1).</del>	Multiple representations
MM143	Part 3: Policies	Chapter 6: Revitalising our town centres	6.32		<del>Part 1 outlines the preferred locations for retail development outside of the borough's town centres, designated employment locations (as defined in policy S.TC1) and main routes (i.e. A roads and other roads along the strategic transport network (where it can be demonstrated that there is a high level of footfall, accessibility and visibility).</del>	Multiple representations
MM144	Part 3: Policies	Chapter 6: Revitalising our town centres	6.33		<del>In other locations, development proposals will also be expected to demonstrate there is a lack of capacity within the designated town centres (for example, showing low levels of vacancy within nearby designated town centres) and there will be no detrimental impact on the character of the area (see part 2).</del>	Multiple representations

MM145	Part 3: Policies	Chapter 6: Revitalising our town centres	6.34		<b>6.32</b> Size limits on New retail units or extensions outside of the town centres hierarchy have been defined should not exceed 200 sqm gross floorpace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map), in line with the 'town centre first' approach set out in government guidance. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF.	Multiple representations
MM146	Part 3: Policies	Chapter 6: Revitalising our town centres		Policy D.TC5	Development of entertainment venues within the D2 or sui generis use classes not referenced in policy D.TC5 will be: a. directed to the Central Activities Zone, Tower Hamlets Activity Areas, Canary Wharf Major Centre and the other designated town centres (except Neighbourhood Parades) where they are compatible with other uses within the town centre; and	Typographical or graphical error
MM147	Part 3: Policies	Chapter 6: Revitalising our town centres		Policy D.TC6	1b it does not compromise the supply of land for new homes (as per the housing trajectory set out in appendix 7) or jobs and our ability to meet the borough's housing and employment targets; and	For clarification, accuracy and consistency.
MM148	Part 3: Policies	Chapter 6: Revitalising our town centres	6.46		For the purposes of this policy, visitor accommodation refers to provision within the C1 use class, such as hotels, bed and breakfasts, traveller hostels, serviced apartments and self-catering apartments. It also refers to serviced apartments limited to 90 day occupancy which may fall under sui generis use. This policy seeks to steer visitor accommodation towards the Central Activities Zone, Tower Hamlets Activity Areas and the borough's district town centres, or along primary routes (e.g. A-roads) where they are adjacent to transport interchanges (such as Docklands Light Railway/railway/underground/bus stations).	For clarification, accuracy and consistency.
MM149	Part 3: Policies	Chapter 7: Supporting community facilities	Evidence links		Insert the following bullet point on the end of the list: Active Design (Sport England, 2015).	Typographical error
MM150	Part 3: Policies	Chapter 7: Supporting community facilities	7.7	Policy D.CF1: Supporting community facilities	Playing fields and outdoor sport facilities, such as multi-use games areas and tennis courts, are also important community facilities. These are addressed within (see policies S.OWS1 and D.OWS3).	For clarification, accuracy and consistency.
MM151	Part 3: Policies	Chapter 7: Supporting community facilities	7.90	Policy D.CF1: Supporting community facilities	Part 2 promotes opportunities to create new community facilities and expand or improve the capacity and accessibility of existing facilities, taking account of future projected community needs (as set out in the Infrastructure Delivery Plan). This will be achieved through the use of planning contributions and working together with partners to ensure adequate community facilities are in place to support the sustainable growth of the borough. Improvements to community facilities may also be funded through the community infrastructure levy where this is identified on the Regulation 123 List.	For clarification, accuracy and consistency.
MM152	Part 3: Policies	Chapter 7: Supporting community facilities	7.1	Policy D.CF2: Existing community facilities	Part 3 seeks to encourage the provision of multi-purpose and shared services which provide opportunities to co-locate or integrate a range of community uses and functions, such as community halls and sport facilities. Consideration should be given to promoting community facilities which can be easily accessed and support a wide range of users in line with the principles of active and inclusive design. This will be achieved through the use of planning contributions and working together with partners to ensure adequate community facilities are in place to support the sustainable growth of the borough. Improvements to community facilities may also be funded through the community infrastructure levy where this is identified on the Regulation 123 List.	For clarification, accuracy and consistency.
MM153	Part 3: Policies	Chapter 7: Supporting community facilities	7.14		Part 1 seeks to resist the loss of the borough's valuable community facilities, except in certain circumstances (see a and b). Statements from relevant providers confirming that the existing or alternative community uses would not be needed or possible in the premises will be required. Where the loss of a community facility is justified, the applicant will need to explore the opportunity to accommodate an alternative community use which would better meet local needs, in accordance with relevant strategies, including the Indoor Sports Facilities Strategy, Open Space Strategy and Infrastructure Delivery Plan. Loss of sports facilities will only be justified where an applicant can provide a robust assessment demonstrating surplus provision or where the proposal includes a replacement of the facility with at least an equivalent function, quality and quantity of sport provision that better meets the needs of the community.	Respond to a representation from a statutory consultee.
MM154	Part 3: Policies	Chapter 7: Supporting community facilities	7.17	Policy D.CF3: New and enhanced community facilities	Part 3 seeks to ensure that any extension to an existing school results in an increase of existing child play space to accommodate the additional needs arising from the development, with a view to promoting shared community use in line with Sport England's guidance. Proposals to replace indoor sport facilities must be of at least equivalent function, quality and quantity and in a suitable location.	Respond to a representation from a statutory consultee.
MM155	Part 3: Policies	Chapter 7: Supporting community facilities		Policy D.CF3: New and enhanced community facilities	New community facilities located outside the borough's town centres will only be permitted where an up-to-date and robust local need can be demonstrated.	Respond to a representation from a statutory consultee.
MM156	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	7.24		Further and higher education (see part 5) refers to the stage of education after secondary school and includes a wide range of institutions including universities and colleges (as defined in the glossary in appendix 1) which provide lifelong learning. It is noted that some further education colleges do include sixth form provision. In order to meet these requirements, the applicant will need to provide evidence of the relevant certification from the Department for Education as well as details of student and staff numbers, enrolment criteria and curriculum details. Sport and recreation facilities within schools should also reflect the principles set out in Sport England and other relevant national governing body guidance.	Respond to a representation from a statutory consultee.

MM157	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	8.1		<p>Lower Hamlets has a number of valued open spaces and water spaces which offer many important social, environmental and economic benefits, including:</p> <ul style="list-style-type: none"> <li>• enhancing amenity;</li> <li>• contributing to healthy lifestyles through providing opportunities for active travel and leisure;</li> <li>• <b>providing sport</b> and recreation opportunities;</li> <li>• providing meeting places for community activities and cultural events;</li> <li>• helping to manage flood risk and mitigating the risks of climate change;</li> <li>• enhancing biodiversity; and</li> <li>• providing a cooling effect to reduce elevated urban air temperature.</li> </ul>	Respond to a representation from a statutory consultee.
MM158	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	Figure 13	S.OWS1	The positioning of the new footbridge on the map will be amended to show the proposed new pedestrian foot bridge linking Billingsgate Market and Aspen Way Site Allocations.	Respond to a representation from a developer / landowner.
MM159	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	8.11	S.OWS1	The Open Space Strategy sets out where strategic open space (i.e. one hectare or above) will be provided across the borough. This includes the requirements relating to the provision of playing pitches and a detailed action plan on how our open space priorities will be addressed. <b>Further details on the specific needs and priorities for the provision of playing pitches and outdoor sport facilities are outlined in the Infrastructure Delivery Plan.</b>	Respond to a representation from a statutory consultee.
MM160	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	8.16		Part c promotes the delivery of a well-connected and high quality network of publicly accessible open spaces through new and improved green grid connections, <b>in accordance with the Transport for London's healthy streets initiative.</b> This can be achieved through new planting in the public realm (including streets, trees and vegetation) and maximising opportunities to create access to nature, natural play and educational elements along the green grid as well as improved signage and posting to enhance way-finding. The Green Grid Strategy has identified a series of strategic green grid projects (as shown on figure 13) to improve cross-borough connections and help address deficiencies across the borough as well as other parts of London.	Respond to a representation from a statutory consultee.
MM161	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	8.18		Whitechapel (including the delivery of the <b>Green Spine</b> - a new north-south pedestrian route <b>linking Whitechapel Road with Commercial Road along with a series of open spaces known as the Green Spine</b> - <del>from the town centre to a new civic square at the site of St Andrews Church. This will</del> <b>-(featuring new public squares behind the proposed civic centre and next to St Augustine with St Phillip's Church).</b>	For clarification, accuracy and consistency.
MM162	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	8.18		The provision of new or improved publically accessible open space and green grid linkages will be promoted throughout the borough in accordance with the Green Grid Strategy and Mayor of London's All London Green Grid Supplementary Planning Guidance, notably at the following locations: <b>The Thames Path (i.e. maintaining and expanding the Thames Path to provide continuous public access to the river)</b>	Respond to a representation from a local resident/community group.
MM163	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	8.11		The Green Grid Strategy identifies opportunities on how to better connect existing open spaces and create smaller scale open spaces in areas of need.	For clarification, accuracy and consistency.
MM164	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces		Policy D.OWS3:	<p>1. Development on areas of open space and <del>the loss of playing fields arising from development</del> will only be supported in exceptional circumstances where:</p> <p>a. it provides essential facilities that enhance the function, use and enjoyment of the open space (e.g. ancillary sport facilities to the playing field use); or</p> <p><del>b. it is a sports facility, the sporting and recreational benefits of which would outweigh the harm resulting from the loss of playing field;</del></p> <p>e.-b. as part of a wider development proposal, both an increase of open space and a higher quality of open space can be achieved; <del>and</del></p> <p><del>d.-c. in any of the circumstances described in parts 2a and 2b, it is demonstrated that it will not result in any adverse impacts on the existing ecological, heritage or recreational value of the open space and the flood risk levels within and beyond the boundaries of the site; and</del></p> <p><b>d. it is an outdoor sport and recreational space or facility, the sporting and recreational benefits of which would outweigh the harm resulting from its loss.</b></p>	Respond to a representation from a statutory consultee.
MM165	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces		S.OWS4 part 1.a	For the purposes of the Local Plan, water space means an area of water (permanently or intermittently) <del>and the adjacent land;</del> and includes rivers, canals, docks, basins, ponds, marshland and other water bodies.	Respond to a representation from a developer / landowner.
MM166	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces		S.OWS4	it does not result in loss or covering of the water space, unless it is a water-related <b>or water-dependant</b> use at appropriate locations;	Respond to a representation from a developer / landowner.
MM167	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	8.34	S.OWS4	Add a new paragraph 8.35 and amend subsequent paragraph numbering: <b>Part 1(d) seeks to ensure that outdoor sport and recreation facilities are protected against unjustified loss in line with the requirements set out in the National Planning Policy Framework.</b>	Respond to a representation from a statutory consultee.

MM168	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	8.4	S.OWS4	In accordance with part 4, development will be expected to demonstrate that it will enhance and not negatively affect the borough's publicly accessible open space, including the Lee Valley Regional Park (consisting of East India Dock Basin and linear towpaths along the River Lea Navigation, Hertford Union Canal and Limehouse Cut), <del>and the</del> Lea River Park (including the Leaway) <del>and the Transport of London's Lea Valley Walk initiative.</del>	Respond to a representation from a statutory consultee.
MM169	Part 3: Policies	Chapter 8: Enhancing our open spaces and water spaces	8.48	S.OWS1	Safety and public use of the borough's water spaces will be improved through development design which provides good pedestrian access, <del>and</del> active frontages to improve surveillance <del>and riparian lifesaving equipment, where appropriate.</del> Increased appeal through active frontages will be particularly important for the docks in Canary Wharf as well as areas around Trinity Buoy Wharf, Limehouse Basin and along the River Lea which can have significant potential to attract visitors.	Typographical or graphical error
MM170	Part 3: Policies	Chapter 9: Protecting and managing our environment		S.OWS1	*Vernal Green - change to Bethnal Green	Typographical or graphical error
MM171	Part 3: Policies	Chapter 9: Protecting and managing our environment	9.2	S.ES1: Protecting and enhancing our environment	Delete "9.2" at the beginning of the sentence.	Typographical error
MM172	Part 3: Policies	Chapter 9: Protecting and managing our environment		S.ES1: Protecting and enhancing our environment	d. reducing <del>clean and waste</del> water use;	To respond to a representation from a statutory consultee
MM173	Part 3: Policies	Chapter 9: Protecting and managing our environment	9.11	S.ES1: Protecting and enhancing our environment	Development must also address London's water stress by reducing <del>clean and waste</del> water use.	To respond to a representation from a statutory consultee
MM174	Part 3: Policies	Chapter 9: Protecting and managing our environment	9.42 - 9.43	D.ES5: Sustainable drainage	9.42 In order to satisfy the requirements within parts 1 and 2, all major developments will be required to submit a drainage strategy alongside the original planning application. All other relevant developments will also be strongly encouraged to do so.  9.43 <del>Surface water reduction and the required run-off rates should be achieved by following the sustainable urban drainage systems hierarchy, which is</del> <del>The sustainable urban drainage systems hierarchy is</del> outlined in more detail in the London Plan.  9.44 Infiltration sustainable urban drainage systems techniques should only dispose of clean roof water into clean, uncontaminated ground. They should not be used for foul discharges or trade effluent, and may not be suitable within source protection zone 1 .	To respond to a representation from a developer / landowner
MM175	Part 3: Policies	Chapter 9: Protecting and managing our environment	9.42 - 9.43	D.ES6: Sustainable water management	Change policy name: Sustainable water <del>management</del> <del>use and infrastructure</del>	To respond to a representation from a statutory consultee
MM176	Part 3: Policies	Chapter 9: Protecting and managing our environment		Policy D.ES7	Delete table numbers	Typographical error
MM177	Part 3: Policies	Chapter 9: Protecting and managing our environment		Policy D.ES7	2. Development is required to maximise energy efficiency based on the following standards:  a. All new non-residential development and non-self-contained residential accommodation over 500 square metres floorspace (gross) <del>must</del> <del>are expected to</del> meet or exceed BREEAM 'excellent' rating. b. All major non-residential refurbishment of existing buildings and conversions over 500 square metres floorspace (gross) <del>must</del> <del>are expected to</del> meet <del>at least</del> <del>or exceed</del> BREEAM non-domestic refurbishment 'excellent' rating. c. As a minimum, all self-contained residential proposals will be strongly encouraged to meet the Home Quality Mark.	To respond to a representation from a developer / landowner
MM178	Part 3: Policies	Chapter 9: Protecting and managing our environment		Policy D.ES7	In addition, developments are expected to meet should implement at least the minimum standards set out in BREEAM (Building Research Establishment Environmental Assessment Method) which applies applies to non-residential developments, residential development arising from conversions and changes of use. This method provides a holistic assessment of the environmental sustainability of a development. The Home Quality Mark is one way of demonstrating the standard of a new residential dwelling, which includes measures for low carbon dioxide, sustainable materials, good air quality and natural daylight. We strongly encourage schemes to use the Home Quality Mark. <del>Developments which are unable to meet these standards must provide evidence demonstrating the constraints and provide an alternative assessment against the requirements in the GLA's Sustainable Design and Construction Supplementary Planning Guidance. If BREEAM/Home Quality Mark/ Sustainable Design and Construction Supplementary Planning Guidance is replaced or amended during the lifetime of the plan, the equivalent replacement requirements will be applied, subject to discussion with our sustainability service.</del>  Add to the Evidence Links box: <del>Sustainable Design and Construction Supplementary Planning Guidance (GLA, 2014)</del>	To respond to a representation from a developer / landowner
MM179	Part 3: Policies	Chapter 9: Protecting and managing our environment	9.53	D.ES9: Noise and vibration	2. Where new noise-sensitive land uses are proposed in proximity to existing noise-generating uses, <del>such as cultural and entertainment venues,</del> development is required to robustly demonstrate how conflict with existing uses will be avoided, through mitigation measures.	To respond to a representation from a statutory consultee

MM180	Part 3: Policies	Chapter 9: Protecting and managing our environment	9.69	D.ES9: Noise and vibration	There have been a number of examples across London of long-standing entertainment venues closing or becoming at risk of closure due to a combination of factors, including noise complaints from new residents and venues being purchased for redevelopment (particularly for housing). This has implications for the long-term future of London's creative and cultural sector which has an impact not just on residents but also its tourism potential. Part 2 uses the agent of change principle to seek to reduce this phenomenon. <b>This principle may also apply to other noise-generating uses, such as industrial uses.</b> Applicants must submit detailed noise assessments and demonstrate that noise levels within the proposed development emitted from nearby uses would be at an acceptable level. Where we are not satisfied that the operations of nearby uses would not be compromised, applications will be refused.	To respond to a representation from a statutory consultee
MM181	Part 3: Policies	Chapter 10: Managing our waste	10.5		Proposed wording agreed.  We will continue to monitor the <b>amount</b> provision of <b>land capable of providing</b> new waste capacity over the course of the <b>Local Plan</b> period. <b>Where loss of capacity occurs with the delivery of and monitoring framework set out in table 17- in section 5.</b>	To address reps: LP689 and LP6
MM182	Part 3: Policies	Chapter 10: Managing our waste	10.16		The London Legacy Development Corporation ( <b>LLDC</b> ) is the planning authority for those sites and areas of search within its boundary (as shown in schedules 2 and 4). The <del>LLDC London Legacy Development Corporation</del> Local Plan (2015-2031) safeguards existing waste sites (listed in schedule 2) and identifies areas of employment land suitable for waste uses (listed in schedule 4). To secure the delivery of an effective waste plan for the borough, Tower Hamlets and the <del>LLDC London Legacy Development Corporation</del> agree that the area of search listed in schedule 4 above is potentially suitable for waste management use. Acceptability of proposals for waste management uses in those locations will be determined with reference to policies within the <del>LLDC London Legacy Corporation</del> Local Plan and any other relevant material considerations that apply to that proposal. Any applications for planning permission in these locations will need to be submitted to the <del>LLDC London Legacy Development Corporation</del> as the local planning authority governing the area that apply to that proposal.	For clarification and consistency
MM183	Part 3: Policies	Chapter 10: Managing our waste	Footnote (75)		Amend footnote to include reference to the current status of the McGrath site:  The McGrath site at Hepscott Road in Fish Island is also a site allocation within the LLDC Local Plan for mixed-use development. <b>There are plans to move the operations at the facility to another site within London and the Greater London Authority have confirmed that this approach is in line with London Plan policies.</b> Ailsa Street is located within the Poplar Riverside Housing Zone.	For clarification and context
MM184	Part 3: Policies	Chapter 10: Managing our waste		D.MW3	The wording will be amended to the following:  All new development must include sufficient <b>accessible</b> space to separate and store dry recyclables, organics and residual waste for collection, <b>both within individual units and for the building as a whole.</b>	Respond to a representation from a local resident / community group.
MM185	Part 3: Policies	Chapter 11: Improving connectivity and travel choice	11.8	S.TR1	Part 1 (a) promotes walking, cycling and public transport as a primary means of travelling. In order to ensure compliance with green grid policies (S.OWS1 and D.OWS3), development should incorporate an improved pedestrian and cycling environment that is safe, accessible and permeable both within the borough and into neighbouring boroughs. It also identifies the necessity to link development to the borough's <b>strategic walk network</b> and cycling network in accordance with the borough's adopted cycle strategy, particularly strategic cycle routes, as well as <b>the need to improve</b> access to river transport (see figure 189), where possible.	Respond to a representation from a statutory consultee.
MM186	Part 3: Policies	Chapter 11: Improving connectivity and travel choice	11.11	S.TR1	Part 1 (d) seeks to ensure that development does not cause an unduly detrimental impact to the safety and efficient operations of existing transport networks, once appropriate mitigation measures have been taken into account. In particular, it is important that development does not:  • compromise the safety of the highway user and/or the ability of public transport providers to safely operate services; <b>which includes consideration of adequate driver welfare facilities and bus stands;</b>	Respond to a representation from a statutory consultee.
MM187	Part 3: Policies	Chapter 11: Improving connectivity and travel choice	11.14	D.TR2	We will work in partnership with neighbouring boroughs, Transport for London and other agencies (e.g. Highways England) to understand and address the future transport needs of the borough. <b>The list below sets out a number of planned interventions (see figure 18) that are required to support the borough's transport network, including (79):</b>  <del>the</del> Delivery of the Elizabeth line; Enhancements to bus services and the Dockland Light Railway; Improved river services and potential new piers at Wapping, Canary Wharf East and Trinity Buoy Wharf; New cycle infrastructure, including the Mayor of London's cycle hire network, <del>and</del> New pedestrian and cycle connections, including a new pedestrian and cycle river crossing between Canary Wharf and Rotherhithe and other river crossings.	Respond to a representation from a statutory consultee.
MM188	Part 3: Policies	Chapter 11: Improving connectivity and travel choice	11.16	D.TR2	This policy seeks to address the impact that development has ( <b>both individually and cumulatively</b> ) on the transport network, particularly issues of congestion, air quality, severance, safety and/or accessibility for cyclists and pedestrians.	Respond to a representation from a local resident / community group.
MM189	Part 1: Setting the scene	Chapter 3: Trends	3.1		Current congestion levels in many parts of the borough are severe and the interconnectedness of the highway network - whether local or strategic - plays a significant role in contributing to this congestion. A development's impact on congestion is not just a matter of building size but depends on its location, use, design, density and operational factors (for instance, a relatively small development could be judged to have a severe impact if it generates a high number of <b>vehicle</b> trips and/or is in a sensitive location). Given the significant capacity constraints on the public transport and highway network, any development <b>that generates a net increase in vehicle trips</b> has the potential to <b>have</b> create a severe impact on <b>the safety and operation of</b> the network within Tower Hamlets.	Respond to a representation from a statutory consultee.

MM190	Part 3: Policies	Chapter 11: Improving connectivity and travel choice	11.22	D.TR2	Part 2 seeks to ensure that development does not exacerbate or overload transport networks through trips associated with its uses. Where appropriate, conditions and/or planning contributions will be used <del>(in accordance with policy D.SG5)</del> <b>sought through section 106 monies</b> to secure mitigation measures required to make a development acceptable in transport terms. <b>This is in addition to community infrastructure levy contributions which fund transport infrastructure improvements on a borough-wide scale. The required infrastructure and/or improvement measures should not be in conflict with the Regulation 123 List. All contributions towards new transport infrastructure improvements must be in accordance with policy D.SG5 and the Planning Obligations Supplementary Planning Document (SPD).</b>	Respond to a representation from a statutory consultee.
MM191	Part 3: Policies	Chapter 11: Improving connectivity and travel choice	11.23	D.TR3	Areas in the borough anticipated to accommodate higher levels of population and economic growth such as the Isle of Dogs and City Fringe, are where existing highway and/or public transport demand is already close to or exceeding supply <b>during peak travel times</b> . Other areas of the borough also experience local highway or public transport stress <b>during these at specific times</b> . Development that increases demand without appropriate mitigation (including infrastructure contributions to service improvements and/or delivering effective modal shift) will not be supported.	Respond to a representation from a statutory consultee.
MM192	Part 3: Policies	Chapter 11: Improving connectivity and travel choice	11.33	D.TR3	Development should also provide parking bays and charging points for electric vehicles, based on the standards and design principles set out in the London Plan. <del>The current standard requires 20% active and 20% passive electrical charging points for electric vehicle charging.</del>	Respond to a representation from a local resident / community group.
MM193	Part 3: Policies	Chapter 11: Improving connectivity and travel choice	11.36	D.TR3	To increase access to cycling in the borough, we are working closely with the Mayor of London and Transport for London to extend the existing cycle hire scheme with new docking stations in appropriate locations. Where appropriate, development will be expected to safeguard land within the site where Transport for London has identified a need to accommodate publicly-accessible shared cycle-hire station(s). <del>Where this is not possible, a contribution will be sought from the developer towards publicly-accessible shared cycle-hire scheme docking station(s) in other locations close to the identified need.</del>	Respond to a representation from a statutory consultee.
MM194	Part 3: Policies	Chapter 11: Improving connectivity and travel choice	11.42	D.TR4	Part 1 ensures that development generating a significant number of vehicle trips for goods and materials will be assessed in relation to its likely impact on the transport network and with reference to the most up-to-date Transport for London guidance relating to deliveries, servicing and construction logistics. <del>In particular, development will need to plan and manage its freight movements through the construction and operational phases of the development, based on the wide range of existing guidance from Transport for London.</del> <b>Construction management plans and/or delivery and servicing plans are required to show how the CLOCS standard has been incorporated and that fleets serving the site have FORS silver accreditation.</b>	Respond to a representation from a developer/landowner.
MM195	Part 4: Delivering sustainable places	All site allocations			Insert site reference numbers before each table 1.1,1.2 etc.	For clarification and consistency
MM196	Part 4: Delivering sustainable places	All relevant site allocations			Insert a paragraph break/space after "Development will be expected to: This change applies to the following sites: · Limeharbour · Marsh Wall East · Millharbour Marian Place Gas Works and The Oval London Dock	For clarification and consistency
MM197	Part 4: Delivering sustainable places	All site allocations			State the following under each site allocation diagram:  <b>For illustrative purposes</b>	For clarification and consistency
MM198	Part 4: Delivering sustainable places	All site allocations			Remove active ground floor uses and plots	For clarification, accuracy and consistency
MM199	Part 4: Delivering sustainable places	All relevant site allocations			Amend the date of the Public Transport Accessibility Levels from 2017 to 2015.	Respond to a representation from a statutory consultee
MM200	Part 4: Delivering sustainable places	All tables outlining site specific requirements			Delete references to maximum floorspace of 25% residential within the site allocations in the Isle of Dogs and South Poplar	For clarification, accuracy and consistency
MM201	Part 4: Delivering sustainable places	All relevant site allocations			<del>Flood zones(s)– Flood zone(s)</del>	For clarification and consistency
MM202	Part 4: Delivering sustainable places	All figures showing individual site allocations			Delete the following text from each diagram (as an example): <b>"Site Allocation 3.1: Ailsa Street"</b>	For clarification, accuracy and consistency

MM203	Part 4: Delivering sustainable places		Figure 38		Amend the figure to: - illustrate the broad locations where the new neighbourhood centres (South Quay & Fish Island) will be focussed - show the open spaces	For clarification, accuracy and consistency
MM204	Part 4: Delivering sustainable places	All relevant site allocations			Include site allocation reference after the name:  Example:  Bishopsgate Goods Yard: <b>1.1</b>	For clarification, accuracy and consistency
MM205	Part 4: Delivering sustainable places	All relevant sub-area diagrams			Amend key and diagrams to distinguish which bridges are existing and which are proposed.	Respond to a representation from a statutory consultee
MM206	Part 4: Delivering sustainable places	All sub-area infographics			In the infrastructure requirements state that a <u>minimum</u> of 0.4 hectares or a <u>minimum</u> 1 hectare is required  For example:  Infrastructure requirements:  - Strategic open space ( <b>minimum of 1 hectare</b> ) - Secondary school	For clarification, accuracy and consistency
MM207	Part 4: Delivering sustainable places	All sub-area infographics			Include details of the amount of open space (hectares) that will be provided within each sub-area	Respond to a representation from a local resident / community group.
MM208	Part 4: Delivering sustainable places	All sub-area infographics			Amend/increase resolution on infographic images to ensure that they are clear	Respond to a representation from a statutory consultee
MM209	Part 4: Delivering sustainable places	Chapter 2: Sub-area 1: City Fringe			Preserve or enhance the fine urban grain and traditional street pattern and respect the integrity, rhythm and visual amenity of the street scene that characterises the area. ( <b>full stop at the end of the sentence</b> )	For clarification, accuracy and consistency
MM210	Part 4: Delivering sustainable places	Chapter 2: Sub-area 1: City Fringe			Make it clear that the Med City Campus Green Link is the Green Spine by amending the key as follows:  "6. Med City Campus Green Link ( <b>the Green Spine</b> )"	Respond to a representation from a developer / landowner.
MM211	Part 4: Delivering sustainable places	Chapter 2: Sub-area 1: City Fringe			Point 16:  Improving air quality and reducing exposure to poor air quality. ( <b>full stop at the end of the sentence</b> )	For clarification, accuracy and consistency
MM212	Part 4: Delivering sustainable places	Chapter 2: Sub-area 1: City Fringe			Point 17:  Deliver a network of new or improved connected open spaces and encourage the greening of the public realm, including Swedenborg Gardens and a linear open space ( <b>known as the Green Spine</b> ), from Commercial Road up along Philpot Street to the new civic square.	For clarification, accuracy and consistency
MM213	Part 4: Delivering sustainable places	Bishopsgate Goods Yard site allocation			Amend plan to show strategic cycling route going diagonally across the site	For clarification, accuracy and consistency



MM214	Part 4: Delivering sustainable places	London Dock	Figure 24		<p>Include wording in the design principles to ensure that the site is able to accommodate the improvements to the triangle</p> <p>Proposed wording:</p> <ul style="list-style-type: none"> <li>improve walking and cycling routes to, from and within the site to establish connections to Shoreditch High Street Overground station, Brick Lane district town centre, <b>Shoreditch Triangle</b> and the new open space. These should align with the existing urban grain to support permeability and legibility;</li> </ul>	Respond to a representation from a statutory consultee
MM215	Part 4: Delivering sustainable places	London Dock	Figure 24		<p>Amend the plans so that:</p> <ul style="list-style-type: none"> <li>the location of the public square is located in the central part of the western portion of the site</li> </ul>	For accuracy, consistency and clarification
MM216	Part 4: Delivering sustainable places	London Dock			<p>Show the location of the new green grid link along the eastern boundary which runs along eastern portion of the northern boundary and goes up Artichoke Hill connecting to Swedenborg Gardens.</p>	For accuracy, consistency and clarification
MM217	Part 4: Delivering sustainable places	Marian Place gas works and The Oval			<p>Proposed wording/additional bullet point:</p> <p><b>An assessment should be carried out to understand the potential contamination on site prior to any development taking place.</b></p>	Respond to a representation from a statutory consultee.
MM218	Part 4: Delivering sustainable places	Marian Place gas works and The Oval	Figure 25		<p>Include correctly sized circles to represent the gasholders</p>	Respond to a representation from a statutory consultee.
MM219	Part 4: Delivering sustainable places	Marian Place gas works and The Oval			<p>Proposed wording for the first design principle :</p> <p>"retain, reuse and enhance the existing heritage assets, including <del>the gasholders and associated structures - gasholders no.2 and no.5,</del> Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated <del>setted pebbled</del> street and railings;"</p>	Multiple representations
MM220	Part 4: Delivering sustainable places	Marian Place gas works and The Oval			<p>The following wording of the employment land use is proposed:</p> <ul style="list-style-type: none"> <li>Employment: a range of <del>new floorspace sizes, including suitable units</del> <b>suitable</b> for the needs of small-medium enterprises, start-ups and creative and tech industries</li> </ul>	Respond to a representation from a developer / landowner.
MM221	Part 4: Delivering sustainable places	Marian Place gas works and The Oval			<p>1. Proposed wording regarding costs in relation to decontamination:</p> <ul style="list-style-type: none"> <li>Development should <del>acknowledge address the associated costs of decommissioning the gasworks and the temporary relocation of any significant equipment and address any environmental pollution and on site decontamination requirements and land contamination</del> caused by the gas works.</li> </ul>	Respond to a representation from a developer / landowner.

MM222	Part 4: Delivering sustainable places	Marian Place gas works and The Oval			Additional delivery considerations to be added :  <ul style="list-style-type: none"> <li>Development will be expected to implement the actions identified in the Thames River Basin Management Plan to support delivery of the objectives of the plan, in accordance with regulation 17 of the Water Environment Regulations 2013.</li> <li>An assessment should be carried out to understand the potential contamination on site prior to any development taking place.</li> </ul>	Respond to a representation from a statutory consultee.
MM223	Part 4: Delivering sustainable places	Marian Place gas works and The Oval			Design principles  <ul style="list-style-type: none"> <li>respond positively to the existing special character of the Regents Canal conservation area and its setting, scale, height, massing and fine urban grain of the surrounding built environment, and specifically integrate heritage assets on site and in the surrounding areas.</li> </ul>	Respond to a representation from a statutory consultee.
MM224	Part 4: Delivering sustainable places	Marian Place gas works and The Oval	Figure 25		Amend size of the site to:  Size (ha) <del>3.75</del> 4.4	Respond to a representation from a developer / landowner.
MM225	Part 4: Delivering sustainable places	Marian Place gas works and The Oval	Figure 25		Remove the local pedestrian/cycling route that extends from the public square adjacent to Hackney Road, through the green grid link in the western section of the site ending at the strategic pedestrian/cycling route intersecting the north-western section of the site. Remove the local pedestrian/cycling route extending from the public square in the eastern section of the site into the central open space. Extend the existing strategic pedestrian/cycling route connecting from the public square in the eastern section of the site to Hare Row to run through the site from Hare Row in the east to Pritchards Road in the west.	Respond to a representation from a local resident / community group.
MM226	Part 4: Delivering sustainable places	Marian Place gas works and The Oval	Figure 25		Amend the plans so that the strategic and local pedestrian/cycle routes do not pass through the gasholders that will also be shown on the map.	Respond to a representation from a local resident / community group.
MM227	Part 4: Delivering sustainable places	Part 4: Delivering sustainable places	Figure 25		<ul style="list-style-type: none"> <li>The removal of ground floor uses to ensure consistency and clarity in the approach to how areas of the site are identified for development.</li> <li>The location of the existing gas holders inserted to highlight important existing structures.</li> <li>Label the public square located in the eastern section of the site 'The Oval'.</li> <li>Remove the strategic pedestrian/cycling route through the southern section of the site from the Oval to Coate Street and replace with a local pedestrian/cycling route as the existing route does not link through to strategic roads.</li> <li>Re-align the Local Pedestrian/cycling route running from the public square adjacent to Hackney Road in the south of the site through to the green grid link running parallel to Regents canal in the northern section of the site to improve site permeability for these users.</li> </ul>	For accuracy, consistency and clarification
MM228	Part 4: Delivering sustainable places	Whitechapel South			Amend the public transport accessibility levels to show the year 2021 due to the arrival of Crossrail:  2021*: 6b      2041: <del>6a-6b</del> 6b  Insert at bottom of the page:  *the year 2021 has been used due to the arrival of Crossrail at Whitechapel	Respond to a representation from a developer / landowner.
MM229	Part 4: Delivering sustainable places	Whitechapel South			Land use requirements  <ul style="list-style-type: none"> <li>Housing</li> <li>Employment-led (within the Local Employment Location) providing suitable units for the needs of life science, medical, and research and educational uses associated with the Med City.</li> <li>Civic centre</li> </ul>	Respond to a representation from a developer / landowner.
MM230	Part 4: Delivering sustainable places	Whitechapel South			<ul style="list-style-type: none"> <li>walking routes and spaces which are accessible to cyclists should be supported through the gGreen Spine linear open space, but should not jeopardise its role and function as a publicly accessible green open space;</li> </ul>	For accuracy, consistency and clarification

MM231	Part 4: Delivering sustainable places	Whitechapel South			Amend 6th bullet point as follows:  • create a sense of place and increase recreational opportunities, access to, and enjoyment of the <b>Green Spine open-space</b> to promote healthy living;	For accuracy, consistency and clarification
MM232	Part 4: Delivering sustainable places	Whitechapel South			• facilitate the delivery of consolidated interconnected open spaces <b>to form the Green Spine</b> , which <b>will link</b> Whitechapel district <del>town</del> - <b>centre</b> to Commercial Road through the following.	For accuracy, consistency and clarification
MM233	Part 4: Delivering sustainable places	Whitechapel South			Part (a) of the last bullet point will be amended to:  • Provision of new and improved <b>green</b> open space ( <b>the Green Spine</b> ) <del>should stretch</del> <b>stretching</b> from Philpot Street to the new civic centre. It should be linear in nature and provide a direct visual link across its length.	For accuracy, consistency and clarification
MM234	Part 4: Delivering sustainable places	Whitechapel South			Part (b) of the last bullet point will be amended to:  • Buildings <b>adjacent to in alignment with</b> the Green <del>linear open space</del> <b>Spine</b> should make a positive contribution to reinforce north-south legibility with permeable routes and visual links through the new development.	For accuracy, consistency and clarification
MM235	Part 4: Delivering sustainable places	Whitechapel South			Part (c) of the last bullet point will be amended to:  c. Existing consented open space which has yet to be implemented on site is an integral element to the provision of 1 hectare of strategic open space <b>and</b> should be re-provided. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new green <b>spine</b> <del>linear open space (known as the green spine)</del> to maximise its multi-functional use.	For accuracy, consistency and clarification
MM236	Part 4: Delivering sustainable places	Whitechapel South			respond positively to the heritage assets and existing character, scale, height, massing and fine urban grain of the surrounding built environment, <b>including the setting of the London Hospital conservation area</b>	For accuracy, consistency and clarification
MM237	Part 4: Delivering sustainable places	Whitechapel South			Amend the delivery considerations as follows:  • Delivery of a health facility should be an <del>NHS-funded</del> primary care facility <b>and</b> re-provide the existing sexual health facility.	Respond to a representation from a developer / landowner.
MM238	Part 4: Delivering sustainable places	Whitechapel South	Figure 26		Amend plans:  • Remove green grid that is shown between the two public squares connecting to Whitechapel Road and instead it should run along the southern boundary of the public square to the south of the Civic Centre and connect to the green link on Cavell Street  • Remove section of the green grid that runs south of Fieldgate Street to Commercial Road.	For accuracy, consistency and clarification
MM239	Part 4: Delivering sustainable places	Whitechapel South			Proposed wording for employment uses:  • Employment-led (within the Local Employment Location) providing suitable units for the needs of life science, <del>medical, and research</del> <b>and educational uses associated with the Med City.</b>	Respond to a representation from a developer / landowner.
MM240	Part 4: Delivering sustainable places	Whitechapel South	Design principles		Amend the map to show the location of St. Augustine's church and St. Philip's church and their associated open spaces.	For accuracy, consistency and clarification
MM241	Part 4: Delivering sustainable places Part 4: Delivering sustainable places	Whitechapel South	Design principles		First bullet point – remove full stop	Typographical or graphical error
MM242	Part 4: Delivering sustainable places	Whitechapel South	Design principles		Final bullet point – insert colon after following_(remove full stop)	For accuracy, consistency and clarification

MM243	Part 4: Delivering sustainable places	Chapter 3: Sub-area 2: Central	Figure 27		Amend the map so that the green grid runs through Tredegar Square Gardens and is consistent with the green grid on the Policies Map and the Green Grid strategy.  Amend the colour of the cycle superhighway so that it is clearly distinguishable from the green grid. The additional wording will be included in the delivery considerations for the site.	For clarification, consistency and accuracy
MM244	Part 4: Delivering sustainable places	Bow Common Gas Works			<b>An assessment should be carried out to understand the potential contamination on site prior to any development taking place.</b>	Respond to a representation from a statutory consultee.
MM245	Part 4: Delivering sustainable places	Bow Common Gas Works			Proposed wording to make reference to the conservation areas and the local nature reserve:  • respond positively to the <del>existing</del> <b>setting of the two conservation areas: Tower Hamlets Cemetery and Swanton Road and the local nature reserve, including as well as</b> the scale height, massing and fine urban grain-of the surrounding built environment.	Respond to a representation from a statutory consultee.
MM246	Part 4: Delivering sustainable places	Chrisp Street	Address		Chrisp Street/East India <del>Dock</del> Road/Kerbey Street	For accuracy, consistency and clarification
MM247	Part 4: Delivering sustainable places	Chrisp Street	Figure 31		Kerbey Street should be shown/labelled on the map as it is referred to in the address.	For accuracy, consistency and clarification
MM248	Part 4: Delivering sustainable places	Chrisp Street	Figure 31		Amend the green grid so that there is a kink in the public square at the centre of the site and it goes straight up in to the centre of the northern section of the site rather than to the north-west corner.	For accuracy, consistency and clarification
MM249	Part 4: Delivering sustainable places	Sub-area 3: Lower Lea Valley			Proposed wording:  • protect and enhance heritage assets on site and in the surrounding areas, including the Lansbury Estate <del>conservation area to the west and Poplar Baths to the south;</del>	Respond to a representation from a statutory consultee.
MM250	Part 4: Delivering sustainable places	Sub-area 3: Lower Lea Valley	4.7		Remove reference to the Bromley-by-Bow Masterplan Supplementary Planning Document	For accuracy, consistency and clarification
MM251	Part 4: Delivering sustainable places	Sub-area 3: Lower Lea Valley	Figure 33		Include the location of the all movements junction at Bow on the map and the proposed bridges at Bow, Leven Road and Ailsa Street.	For accuracy, consistency and clarification
MM252	Part 4: Delivering sustainable places	Sub-area 3: Lower Lea Valley	Figure 33		Amend the map to include the bridge links shown on the Ailsa Street and Leven Road Gas Works site allocations	For accuracy, consistency and clarification
MM253	Part 4: Delivering sustainable places	Sub-area 3: Lower Lea Valley	Sub-area principles		Propose a minor modification to the wording to include reference to heritage assets.  "Respect and <b>positively</b> respond to the historic industrial character of the area ( <b>including heritage assets</b> ) and reinforce its local distinctiveness"	Respond to a representation from a statutory consultee.
MM254	Part 4: Delivering sustainable places	Leven Road Gas Works	Figure 36		Amend the key: Safeguarded <del>W</del> aste <del>S</del> ite	Typographical error
MM255	Part 4: Delivering sustainable places	Leven Road Gas Works			Amend the existing strategic pedestrian/cycle route running through the centre of the site towards Oban Street in the east to a Local pedestrian/cycle route.	For accuracy, consistency and clarification

MM256	Part 4: Delivering sustainable places	Leven Road Gas Works			Proposed wording for the gasholders:  <del>strongly encourage the retention, reuse and enhancement of the existing non-designated heritage asset, Gasholder No.1, which is located in the south-west corner of the site, due to its local character and landmark merit;</del>  Retain and reuse parts of the dismantled gas holder no. 1 within the future development.	Respond to a representation from a developer / landowner.
MM257	Part 4: Delivering sustainable places	Leven Road Gas Works			Proposed changes to the delivery considerations:  Development should accord with flood mitigation and adaptation measures in the borough's <del>SFRA Strategic Flood Risk Assessment</del> and sequential test <del>and the Thames Estuary 2100 Plan.</del>	For accuracy, consistency and clarification
MM258	Part 4: Delivering sustainable places	Leven Road Gas Works			Additional bullet point in the delivery considerations:  Development will be expected to implement the actions identified in the Thames River Basin Management Plan to support delivery of the objectives of the plan, in accordance with regulation 17 of the Water Environment Regulations 2013.	Respond to a representation from a statutory consultee.
MM259	Part 4: Delivering sustainable places	Leven Road Gas Works			Additional bullet point in the delivery considerations:  An assessment should be carried out to understand the potential contamination on site prior to any development taking place.	Respond to a representation from a developer / landowner.
MM260	Part 4: Delivering sustainable places	Leven Road Gas Works			Make the following amendments to the land use requirements:  Employment: Provision of new employment floorspace numbers through a range of floor space sizes which support small-to-medium enterprises, creative industries and retail.	Respond to a representation from a developer / landowner.
MM261		Leven Road Gas Works			Make the following amendments to the design principles:  •respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its riverside location. <del>It will require active street frontages that fit well with the existing 2-storey terraced houses facing the site and sensitive to the scale of the adjacent 2-storey residential area, and the amenity of rear gardens backing on to the site. In particular, it should deliver an appropriate transition in scale, sensitive to the amenity of adjoining residential properties and buildings in close proximity. The new streets should complement the existing network and deliver active frontages.</del>  • facilitate a new or extended bus route to serve through the site to enhance access to public transport.	Respond to a representation from a developer / landowner.
MM262		Leven Road Gas Works			The proposed amendments to the delivery considerations:  • provide and secure the necessary safeguard land within the site to facilitate the delivery of a new crossings bridge over the River Lea to improve access to the major transport interchange at Canning Town and ensure continuity of a green link to Cody Dock; and ensure that the safeguarded land is carefully incorporated into the future development and the Leaway  •Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on site decontamination requirements caused by the gas works".  • Access to public transport and pedestrian and cycle connectivity delivery of walking and cycling bridge across the River Lea will need to be improved in line with the phasing of development and in coordination with London Borough of Newham.	Respond to a representation from a developer / landowner.
MM263	Part 4: Delivering sustainable places	Sub-area 4: Isle of Dogs and south Poplar	Figure 38		The following changes will be made to the map:  1. Show location of south dock bridges 2. Show location of pier at Greenwich Peninsula 3. Amend colour of cycle superhighway so that it is clearly distinct from other designations	Respond to a representation from a statutory consultee.

MM264	Part 4: Delivering sustainable places	Sub-area 4: Isle of Dogs and south Poplar			Point 16: Facilitate the delivery of useable, high quality new and improved publicly accessible open space that is well integrated into the green grid network, including a new park at Millwall Slipway including improvements to Millwall Outer Dock Slipway to increase the usability of this existing open space.	Respond to a representation from a statutory consultee.
MM265	Part 4: Delivering sustainable places	Sub-area 4: Isle of Dogs and South Poplar	5.7		Remove reference to the OAPF as a relevant evidence link: • Isle of Dogs and South Poplar Opportunity Area Planning Framework Supplementary Planning Document (emerging)	For accuracy, consistency and clarification
MM266	Part 4: Delivering sustainable places	Sub-area 4: Isle of Dogs and South Poplar			Increase resolution on infographic icons	Respond to a representation from a statutory consultee.
MM267	Part 4: Delivering sustainable places	Aspen Way			The sub-area development principle no 20 will be amended as follows to ensure that it is publicly accessible : Ensure a continuous and vibrant publicly accessible riverside walkway along the Thames Path, linking Greenwich to the River Lea Park.	Respond to a representation from a statutory consultee.
MM268	Part 4: Delivering sustainable places	Aspen Way	Figure 40		The first sentence of the first bullet point of the design principles will be amended as follows • respond positively to the existing character, scale, height, massing and urban grain of the surrounding built environment, including the St. Matthias Church conservation area. The setting of adjacent housing should also be protected through appropriate screening and landscaping;	Respond to a representation from a statutory consultee.
MM269	Part 4: Delivering sustainable places	Aspen Way	Figure 40		• Remove the most western local pedestrian/cycle route that is adjacent to the strategic pedestrian/cycle route • Re-align the strategic pedestrian/cycle route to connect with the proposed bridge connection over Aspen Way (i.e. replace the existing local route with the strategic route).	For accuracy, consistency and clarification
MM270	Part 4: Delivering sustainable places	Aspen Way	Figure 40		Amend the plan to straighten the western strategic pedestrian cycling route	For accuracy, consistency and clarification
MM271	Part 4: Delivering sustainable places	Aspen Way	Figure 40		Amend the plan to extend the local pedestrian/cycling link that goes along the southern boundary so that it continues to the west boundary of the site just outside of the site allocation.	For accuracy, consistency and clarification
MM272	Part 4: Delivering sustainable places	Aspen Way	Figure 40		Show the 'noise or air screening/green buffer' in the key	For accuracy, consistency and clarification
MM273	Part 4: Delivering sustainable places	Aspen Way	Figure 40		Extend the 'noise or air screening/green buffer' along the entire southern boundary	For accuracy, consistency and clarification
MM274	Part 4: Delivering sustainable places	North Quay			Show the green grid adjacent/running parallel to the western strategic pedestrian/cycling route going from the northern section of the site down to the northern boundary of North Quay.	For accuracy, consistency and clarification
MM275	Part 4: Delivering sustainable places	Billingsgate Market			• comply with the requirements of the Canary Wharf tall building zone (as set out in policy D.DH6), where tall buildings are proposed; • respond positively to the existing character scale, height, massing and urban grain of the surrounding built environment, particularly the dockside adjacent buildings and along the existing residential developments on the eastern side of Trafalgar Way;	For accuracy, consistency and clarification

MM276	Part 4: Delivering sustainable places	Billingsgate Market			<ul style="list-style-type: none"> <li>improve public realm (specifically along Upper Bank Street) to address the severance caused by Trafalgar Way;</li> </ul>	Respond to a representation from a statutory consultee.
MM277	Part 4: Delivering sustainable places	Billingsgate Market	Figure 41		Amend key and icon to show that the bridge connections are proposed.	Respond to a representation from a statutory consultee.
MM278	Part 4: Delivering sustainable places	Billingsgate Market	Figure 41		<ul style="list-style-type: none"> <li>Remove the eastern local pedestrian/cycling routes into North Dock from the site.</li> <li>Re-align the westernmost strategic pedestrian/cycling route to the westernmost bridge over Aspen Way.</li> <li>Re-align the strategic pedestrian/cycling route through the centre of the site to the central bridge connection over Aspen Way to the north of the site.</li> <li>Amend the strategic pedestrian/cycling route from the site to Blackwall Basin to a local pedestrian/cycling route.</li> </ul>	For accuracy, consistency and clarification
MM279	Part 4: Delivering sustainable places	Billingsgate Market	Figure 41		<p>Additional bullet point in the delivery considerations:</p> <p>An assessment should be carried out to understand the potential contamination on site prior to any development taking place.</p>	Respond to a representation from a statutory consultee.
MM280	Part 4: Delivering sustainable places	Crossharbour Town Centre	Figure 42		<ul style="list-style-type: none"> <li>Insert "Rail viaduct" into the key.</li> <li>Remove the strategic pedestrian/cycling route along the southern boundary of the site through Mudchute Park.</li> <li>Remove the northern section of the central local pedestrian/cycling route so that it ends where it intersects with the central public square.</li> <li>Remove the northernmost section of the westernmost local pedestrian/cycling route where it intersects with the central green grid route towards the sites red line boundary.</li> </ul>	For accuracy, consistency and clarification
MM281	Part 4: Delivering sustainable places	Crossharbour Town Centre			<ul style="list-style-type: none"> <li>comply with the requirements of the Millwall Inner Dock tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed</li> <li>respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, and Mudchute Park. Specifically, it should acknowledge provide a transition in scale, height, massing and urban grain from the low rise nature of the immediate residential area to the north and east, and address the setting of the local nature reserve and Mudchute Park.</li> </ul>	For accuracy, consistency and clarification
MM282	Part 4: Delivering sustainable places	Limeharbour			<ul style="list-style-type: none"> <li>comply with the requirements of the Millwall Inner Dock tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed complement the tall building cluster in Canary Wharf through appropriate-</li> <li>provide an appropriate transition in taller building heights and generous spacing between buildings, whilst in order to respect and being informed by the existing character, specifically scale, height, massing, views and urban grain of its dockside location and the surrounding low to mid-rise built environment of , particularly the lower rise buildings of Cubitt Town to the south-east;</li> </ul>	For accuracy, consistency and clarification
MM283	Part 4: Delivering sustainable places	Marsh Wall East			<ul style="list-style-type: none"> <li>comply with the requirements of the Canary Wharf tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed complement the tall building cluster in Canary Wharf through appropriate-</li> <li>maintain the existing block structure building heights, whilst respecting and being informed by the existing character, scale, height, massing, views and urban grain of its dockside location and surrounding built environment. particularly .In particular provide a transition in scale in relation to the lower rise buildings of Cubitt Town to the south-east and ensure appropriate spacing between buildings to enable visual permeability between Marsh Wall and South Dock;</li> </ul>	For accuracy, consistency and clarification
MM284	Part 4: Delivering sustainable places	Marsh Wall West			<ul style="list-style-type: none"> <li>comply with the requirements of the two tall building zones, Canary Wharf and Millwall Inner Dock designations (as set out in policy D.DH6) that the site is situated in, where tall buildings are proposed. complement the tall building cluster in Canary Wharf through-</li> <li>provide appropriate taller building heights, whilst respecting positively complementing and being informed by the existing character, scale, height, massing, views and urban grain of specifically its dockside location and surrounding built environment, particularly the lower rise buildings of Millwall to the south-west;</li> </ul>	For accuracy, consistency and clarification



MM285	Part 4: Delivering sustainable places	Marsh Wall West	Figure 45		Amend plan: <ul style="list-style-type: none"> <li>Include green link in the south west corner of the site linking to Millwall Inner Dock</li> <li>Include green grid linking from the existing green grid on Manchester Road to Marsh Wall.</li> </ul>	For accuracy, consistency and clarification
MM286	Part 4: Delivering sustainable places	Marsh Wall West	Figure 45		Include existing and proposed bridges, including south dock bridge. Ensure that they have different keys so that they can be distinguished.	For accuracy, consistency and clarification
MM287	Part 4: Delivering sustainable places	Marsh Wall West			Insert the South Quay Footbridge on the figure and show the bridge connection on the figure key.	For accuracy, consistency and clarification
MM288	Part 4: Delivering sustainable places	Millharbour South			<ul style="list-style-type: none"> <li>comply with the Millwall Inner Dock tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed</li> <li>respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its dockside location; specifically, it should step down from Canary Wharf Marsh Wall to the smaller scale residential areas south of Millwall Dock and enable visual permeability between Millharbour and Millwall Inner Dock;</li> <li>comply with the Millwall Inner Dock tall building zone designation (as set out in policy D.DH6) that the majority of the site is situated in, where tall buildings are proposed.</li> </ul>	For accuracy, consistency and clarification
MM289	Part 4: Delivering sustainable places	Millharbour			<ul style="list-style-type: none"> <li>respond positively to the existing local character, scale, height, massing and fine urban grain of the surrounding built environment and its dockside location; specifically, it should step down from Canary Wharf Marsh Wall to the smaller-scale residential areas south of Millwall Dock;</li> </ul>	For accuracy, consistency and clarification
MM290	Part 4: Delivering sustainable places	Millharbour	Figure 47		<ul style="list-style-type: none"> <li>Remove the section of the green grid that runs from the junction of Bying Street and Mastmaker Road and from the west to the east of the site</li> <li>Extend the green grid in a northern direction to Marsh Wall and join it to the green grid that runs along the northern boundary of the site.</li> </ul>	For accuracy, consistency and clarification
MM291	Part 4: Delivering sustainable places	North Quay			<ul style="list-style-type: none"> <li>comply with the requirements of the Canary Wharf tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed;</li> <li>respond positively to the existing character, scale, height, massing and urban grain of the surrounding built environment and its dockside location;</li> </ul>	For accuracy, consistency and clarification
MM292	Part 4: Delivering sustainable places	North Quay			<ul style="list-style-type: none"> <li>improve the quality and create a positive sense of place with an arrival points in the form through the delivery of an active public square at the northern corners of the site, which interconnects to a north-south linear square from the connecting the Canary Wharf Elizabeth line sStation and the dockside promenade (Elizabeth line) to the Poplar DLR station and Poplar High Street; and</li> <li>improve or enhance walking and cycling connections to, from and within the site to:-</li> </ul>	For accuracy, consistency and clarification
MM293	Part 4: Delivering sustainable places	North Quay			<p>a. accommodate a new east-to-west cycle route along the northern boundary of through the site which facilitates connections to joins into the cycle network and the DLR and underground stations adjoining the site; pedestrians movement to/from the DLR stations at Poplar and West India Quay and the Elizabeth line station;</p> <p>b. facilitate walking and cycling connections across Aspen Way between Canary Wharf and Poplar High Street and across and towards Trafalgar Way and towards Blackwall Basin, Poplar High Street and Canary Wharf, and to the wider area; and</p> <p>e. address the barrier of Aspen Way and integrate the site with Poplar High Street to the north, and the Canary Wharf Elizabeth Line Station Crossrail station to the south west. These routes should align with the existing urban grain to support permeability and legibility.</p>	Respond to a representation from a developer / landowner.
MM294	Part 4: Delivering sustainable places	North Quay	Figure 48		"improve strategic links from Canary Wharf to Poplar High Street through the provision of new enhanced north-south links;"	Respond to a representation from a developer / landowner.
MM295	Part 4: Delivering sustainable places	North Quay	Figure 48		<ul style="list-style-type: none"> <li>remove the section of the strategic/pedestrian cycling route on Upper Bank Street</li> <li>Shorten the length of the strategic and pedestrian cycling route going over Aspen Way (remove the curved part of the arrow at the top)</li> </ul>	For accuracy, consistency and clarification

MM296	Part 4: Delivering sustainable places	North Quay	Figure 48		Amend central north south strategic pedestrian/cycling route so that it aligns with the green grid from north to south.	For accuracy, consistency and clarification
MM297	Part 4: Delivering sustainable places	North Quay	Figure 48		Amend plans to show the location of the existing bridge	For accuracy, consistency and clarification
MM298	Part 4: Delivering sustainable places	North Quay			Amend the plans to show the green grid running along the north west boundary of the site and along the north west section of the site. Extend the green grid that runs through the centre of the site to the north so that it aligns with the strategic pedestrian and cycle route	For accuracy, consistency and clarification
MM299	Part 4: Delivering sustainable places	Reuters	Design principles		<ul style="list-style-type: none"> <li>comply with the requirements of the Blackwall tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed;</li> <li>respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment specifically addressing the transition of building heights, scale and massing from the tall buildings cluster at Blackwall roundabout to the medium rise nature of East India. and its dockside location. Specifically, buildings should step down from Canary Wharf the neighbourhood centre towards the river and enable visual permeability between Blackwall Way and the River Thames;</li> </ul>	For accuracy, consistency and clarification
MM300	Part 4: Delivering sustainable places	Reuters			Remove the following bullet point: explore the opportunity to incorporate the existing jutting pier into the development.	For accuracy, consistency and clarification
MM301	Part 4: Delivering sustainable places	Reuters	Figure 49		Amend boundary to exclude the pier/jetty	For accuracy, consistency and clarification
MM302	Part 4: Delivering sustainable places	Riverside South			<ul style="list-style-type: none"> <li>comply with the requirements of the Canary Wharf tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed;</li> <li>respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and enable visual permeability between Westferry Road and the River Thames;</li> </ul>	For accuracy, consistency and clarification
MM303	Part 4: Delivering sustainable places	Westferry Print Works			Additional delivery consideration:  An assessment should be carried out to understand the potential contamination on site prior to any development taking place.	Respond to a representation from a statutory consultee.
MM304	Part 4: Delivering sustainable places	Westferry Print Works			Wording can be amended to say: <del>Employment re-provision of existing employment by way of intensifying employment job numbers.</del> A range of employment space sizes, including small-to-medium enterprises	Respond to a representation from a developer / landowner.
MM305	Part 4: Delivering sustainable places	Westferry Print Works	Figure 51		<ul style="list-style-type: none"> <li>comply with the requirements of the Millwall Inner Dock tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed within this zone</li> <li>respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its dockside location. Specifically, buildings should step down from Canary Wharf-Marsh Wall to the smaller scale residential properties to within the the north and southern part of the Isle of Dogs and to the west of Millharbour. Development should enable clear lines of sight between Millharbour and Millwall Outer Dock and ensure multiple visual and pedestrian permeability between Tiller Road and Millwall Outer Dock;</li> </ul>	For accuracy, consistency and clarification
MM306	Part 4: Delivering sustainable places	Westferry Print Works	Figure 51		Amend the strategic pedestrian/cycling route through the site to a Local pedestrian/cycling route and remove part of the strategic pedestrian/cycling route from Westferry Road to the River Thames.	For accuracy, consistency and clarification
MM307	Part 4: Delivering sustainable places	Westferry Print Works	Figure 51		Show green grid route along the eastern boundary of the site  Show the new route that joins the east and southern boundaries by going over the south east section of the site.	For accuracy, consistency and clarification

MM308	Part 4: Delivering sustainable places	Wood Wharf			<ul style="list-style-type: none"> <li>comply with the requirements of the Canary Wharf tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed; complement the tall building cluster in Canary Wharf through-</li> <li>incorporate appropriate taller building heights, while respecting and being informed by the existing character, scale, height, massing and urban grain of the surrounding built environment and its dockside location;</li> </ul>	For accuracy, consistency and clarification
MM309	Part 4: Delivering sustainable places	Wood Wharf	Figure 52		Include section of green grid that is missing that connects the existing green grid to the south dock to the west	For accuracy, consistency and clarification
MM310	Part 4: Delivering sustainable places	Wood Wharf	Figure 52		Show location of bridges	Multiple representations
MM311	Part 4: Delivering sustainable places	Isle of Dogs & South Poplar	5.7		Delete wording: Table 9	Typographical error
MM312	Part 4: Delivering sustainable places	Isle of Dogs & South Poplar	Figure 38		Some of the key is missing. Insert "National Cycle Network"	Typographical error
MM313	Part 6: Appendices	Appendix 1: Glossary and acronyms			Neighbourhood plans must be in general conformity with the London Plan and the strategic policies of the development plan-Lea Plan, although they can allocate sites to deliver housing and other uses and provide additional guidance to address specific neighbourhood issues or identify opportunities for regeneration and priority projects within the neighbourhood area. Appendix 5 sets out which policies within the Local Plan are considered to be strategic for the purposes of neighbourhood planning.	For clarity
MM314	Part 6: Appendices	Appendix 1: Glossary and acronyms	Water space:		Water space: An area of water (permanently or intermittently) and the adjacent land, and includes rivers, canals, docks, basins, ponds, marshland and other water bodies.	To respond to a representation from a developer / landowner
MM315	Part 6: Appendices	Appendix 1: Glossary and acronyms	Insert the following words to appendix 1: glossary and acronyms:		<p>Term: Fleet Operator Recognition Scheme Silver accreditation.</p> <p>Abbreviation: FORS</p> <p>Explanation: The FORS scheme is a voluntary accreditation scheme encompassing all aspects of safety, fuel efficiency, vehicle emissions and improved operations. The FORS silver accreditation is awarded to operators who maintain their bronze accreditation and are able to demonstrate they meet the FORS silver accreditation requirements.</p>	To respond to a representation from a developer / landowner
MM316	Part 6: Appendices	Appendix 1: Glossary and acronyms	Insert the following words to appendix 1: glossary and acronyms:		<p>Term: Construction logistics and community safety standard</p> <p>Abbreviation: CLOCS</p> <p>Explanation: The CLOCS standard is a common standard for use by the construction logistics industry to ensure that construction companies follow effective practice in the management of their operations, vehicles, drivers and construction sites. Each requirement has been developed to reduce the risk of a collision between heavy goods vehicles in the construction sector and vulnerable road users such as cyclists and pedestrians.</p>	To respond to a representation from a developer / landowner
MM317	Part 6: Appendices	Appendix 1: Glossary and acronyms	archaeological priority areas		<p>A defined area where there is significant known archaeological interest or potential new discoveries which might be affected by development</p> <p>These areas have been categorised into one of the following tiers according to their relative archaeological significance and potential.</p> <p>Tier 1: Area which is known or strongly suspected to contain a heritage asset of national importance (e.g. scheduled monument)</p> <p>Tier 2: Area where there is known presence or likely presence of heritage assets of archaeological interest</p> <p>Tier 3: Area with archaeological potential</p>	For clarification – the tiers are identified on the key to the Policies Map
MM318	Part 6: Appendices	Appendix 1: Glossary and acronyms	Major Development and Referable Development		Insert missing bullet points	Typographical error.

MM318	Part 6: Appendices	Appendix 1: Glossary and acronyms	Major Centre		Canary Wharf has been identified as the only major centre within the borough because it <b>A major centre</b> has over 50,000 square metres of retail space, serves a borough-wide catchment, has a combined residential and employment density (in its catchment) in excess of other centres in the borough and contains a variety of functions and services, including a growing leisure economy.	For consistency
MM318	Part 6: Appendices	Appendix 1: Glossary and acronyms	Strategic development		Strategic development: Proposals involving <b>more than</b> 100 homes or 10,000 square metres of floorspace	For clarity
MM318	Part 6: Appendices	Appendix 1: Glossary and acronyms	Employment uses:		<b>Employment uses: Offices, industrial and storage and distribution facilities which fall under B1,B2 and B8 of the use classes order, as well as other sui generis uses with industrial functions.</b>	To respond to a representation from a developer / landowner
MM318	Part 6: Appendices	Appendix 1: Glossary and acronyms	Referable Development		PIPlanning	
MM318	Part 6: Appendices	Appendix 1: Glossary and acronyms	Life sciences:		<b>Life sciences: the sciences concerned with the study of living organisms, including biology, botany, zoology, microbiology, physiology, biochemistry, and related subjects.</b>	To respond to a representation from a developer / landowner
MM318	Part 6: Appendices	Appendix 2: Links to the Core Strategy & Managing Development Document	2.1		<b>Affordable workspace: "flexible workspace which is let to a workspace manager, and which will allow for occupation by the end users in one or more sectors on terms: accessible to a wide range of users including but not limited to local residents, start-up entrepreneurs SMEs; • substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; • at a rate comparable with similar facilities available in Tower Hamlets or (if sufficient comparator premises do not exist in the borough) across London as a whole; and • at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s)."</b>	To respond to a representation from a developer / landowner
MM318	Part 6: Appendices	Appendix 3: Parking standards	Amend table		Unbold text Amend the first column of the table sub heading	Typographical error
MM318	Part 6: Appendices	Appendix 3: Parking standards	Amend table		Use class ( <b>gfa stands for gross floor area and sqm stands for square metres</b> )	For clarification
MM318	Part 6: Appendices	Appendix 3: Parking standards	Amend table		Residential <del>See table A1</del>	For clarification
MM318	Part 6: Appendices	Appendix 3: Parking standards	Amend table		B1b ( <b>research &amp; development</b> ), & B1c ( <b>light industry</b> )	For clarification
MM318	Part 6: Appendices	Appendix 4: Waste collection standards	Amend table		There are three main groups of waste collection systems and some are on-site waste processing systems, which could be considered to help us reduce the burden on waste collection services. - These are as follows.; (remove semi-colon)	Typographical error
MM318	Part 6: Appendices	Appendix 5: Strategic policies in the Local Plan for the purposes of neighbourhood planning	5.1		The National Planning Policy Framework requires local planning authorities to <del>set out</del> clearly <b>set out</b> their strategic policies in order to support the requirement for neighbourhood plans to be in general conformity with the strategic policies of the <del>Local Plan</del> <b>development plan</b> .	Definitions / terms (clarify meaning)
MM318	Part 6: Appendices	Appendix 6: Noise	Further information and guidance (after 6.9)		Further information and guidance  <ul style="list-style-type: none"> <li>• Noise Policy Statement for England (Department for Environment, Food and Agriculture, 2010)</li> <li>• <del>Guidance on the control of odour and noise from commercial kitchen exhaust (Department for Environment, Food and Agriculture, 2011)</del> <b>Heating and Ventilation Contractor Association – DW/172 Specification for Kitchen Ventilation Systems (2005)</b></li> <li>• British Standard 8233: Guidance on Sound insulation and noise reduction for buildings (2014)</li> <li>• British Standard 4142: Methods for rating and assessing industrial and commercial sound (2014)</li> <li>• British Standard 6472: Guide to evaluation of human exposure to vibration in buildings (2008)</li> <li>• BB93: Acoustic design of schools: performance standards (2015)</li> <li>• <del>British Standard 5228: Code of practice for noise and vibration on construction and open sites</del> <b>British Standard 5228:2009+A1:2014 Code of practice for noise and vibration on construction and open sites (2014)</b></li> </ul>	Remove out of date references
MM318	Part 6: Appendices	Appendix 6: Noise	Noise levels applicable to noise sensitive residential development proposed in areas of existing noise (TABLE)		Noise at 1 metre from noise sensitive façade/free field, Night, SOAEL (red) <del>&gt;80</del> <b>45</b> dB Lafmax  Inside a bedroom, Night, LOAEL (Green), <del>70</del> <b>45</b> dB Lafmax  Inside a bedroom, Night, LOAEL (Amber), <del>80</del> <b>45</b> dB Lafmax  Inside a bedroom, Night, LOAEL (Red), <del>80</del> <b>45</b> dB Lafmax  Outdoor living space (free field), Day, LOAEL (Amber), 50dB to 55dBLAeq, <del>16</del> <b>hr</b>	Typographical errors

MM318	Part 6: Appendices	Appendix 6: Noise	Noise insulation		Where the development falls within an area of high noise (amber and red), the <del>good</del> standard of British Standard 8233 should be met: <del>the reasonable standard may only be allowed where other overriding factors have been agreed with our environmental health service.</del>	Remove out of date references
MM318	Part 6: Appendices	Appendix 6: Noise	Noise levels applicable to proposed industrial and commercial developments (including plant and machinery) (TABLE)		Outside bedroom Window (façade), Night, LOAEL (Green), 'Rating level' 10dB* below background <del>and no events exceeding 57dBLAmax</del>  Outside bedroom Window (façade), Night, LOAEL (Amber), 'Rating level' between 9dB below and 5dB above background <del>or noise events between 57dB</del>  Outside bedroom Window (façade), Night, LOAEL (Red), 'Rating level' greater than 5dB above background <del>and/or events exceeding 88dBLAmax</del>	Remove out of date references
MM318	Part 6: Appendices	Appendix 6: Noise	Entertainment noise (6.21)		6.21 Assessments for noise from <del>proposed</del> entertainment and leisure premises <del>or from proposed sensitive uses in clos</del>	To ensure alignment with policy D.ES8 Noise and vibration
MM318	Part 6: Appendices	Appendix 7: Housing trajectory	Vibration levels from uses such as railways, roads, leisure and entertainment premises and/or plant or machinery at which planning permission will not normally be granted or in line with the most current version of British Standard 6472 (TABLE)		Vibration inside dwellings, Day, 07:00-23:00, <del>0.2</del> 0.2 VDV ms-1.75  Vibration inside dwellings, Night, 23:00-07:00, <del>0.4</del> 0.1 VDV ms-1.75  Vibration inside offices, Day, evening and night, 00:00-24:00, 0.4 VDV ms-1.75  Vibration inside workshops, Day, evening and night, 00:00-24:00, <del>0.4</del> 0.8 VDV ms-1.75	Typographical error.
MM318	Part 6: Appendices	Appendix 7: Housing trajectory	First table in appendix, third column		Change -7,4 to -7,4 <sup>75</sup>	Numerical error
MM318	Part 6: Appendices	Appendix 7: Housing trajectory	Third table in appendix		Amend table (SHLAA without permission) to read: 58606	Numerical error
MM318	Part 6: Appendices	Appendix 7: Housing trajectory	Third table in appendix		Footnotes are missing under the third table.  This table should also be re-formatted to be consistent with the first two tables.	Missing footnote needed. And formatting of table.
MM318	Part 6: Appendices	Appendix 7: Housing trajectory	Third table in appendix		Amend colours so consistent with second table	For clarification
MM318	Part 6: Appendices	Appendix 7: Housing trajectory	Paragraph 7.3		Amend paragraph 7.3 as follows.  Tower Hamlets has a sufficient supply of land to meet its objectively assessed housing need (46,458 homes) during the entire plan period. We will also be meeting and exceeding the London Plan (GLA, 2016) target to help meet city wide needs up to 2026.	For clarification
MM318	Policies Map				Amend the colour of the cycle superhighway so that it is clearly distinguishable from other designations.	For clarification

# APPENDIX 4: TOWER HAMLETS LOCAL PLAN DOCUMENTS TO BE SUBMITTED TO THE SECRETARY OF STATE FOR EXAMINATION

## Submission documents

Key evidence base document	Purpose / justification
<b>Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (Regulation 19)</b>	<ul style="list-style-type: none"> <li>This is the final draft version of the Local Plan. Consultation on this document took place between 2nd October 2017 and 13th November 2017 (known as the regulation 19 stage).</li> </ul>
<b>Schedule of Minor Modifications (2018)</b>	<ul style="list-style-type: none"> <li>Minor modifications to the regulation 19 version. However, these changes do not materially affect the soundness of the plan</li> </ul>
<b>Regulation 22 Statement (2018)</b>	<ul style="list-style-type: none"> <li>Explains how the London Borough of Tower Hamlets has undertaken community participation and stakeholder involvement in the production of the Local Plan</li> </ul>
<b>Duty to Cooperate Statement (2018)</b>	<ul style="list-style-type: none"> <li>Evidence of the efforts we have made to cooperate on strategic cross boundary matters</li> </ul>
<b>Schedule of Representations (2018)</b>	<ul style="list-style-type: none"> <li>Copies of the representations on the Local Plan (regulation 19)</li> </ul>
<b>Policies Map (Regulation 19)</b>	<ul style="list-style-type: none"> <li>A map illustrating the policies and proposals of the Local Plan</li> </ul>
<b>Local Development Scheme (2018)</b>	<ul style="list-style-type: none"> <li>Local Plan timetable through to adoption</li> </ul>
<b>Integrated Impact Assessment (2017)</b>	<p>Incorporates the following impact assessments of the Local Plan to meet European and national requirements and best practise approaches:</p> <ul style="list-style-type: none"> <li>Sustainability Appraisal / Strategic Environmental Assessment;</li> <li>Health Impact Assessment</li> <li>Equalities Impact Assessment</li> <li>Habitats Regulations Assessment</li> </ul>
<b>Statement of Community Involvement Refresh (2017)</b>	<ul style="list-style-type: none"> <li>Sets out how the community can get involved in the preparation of local planning policy documents</li> </ul>

## Other relevant documents

Key evidence base document	Purpose / justification
<b>Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits (Regulation 18)</b>	<ul style="list-style-type: none"> <li>Full draft version of the document</li> <li>Community participation and engagement</li> </ul>
<b>Our Borough, Our Plan: A new Local Plan First Steps (Regulation 18)</b>	<ul style="list-style-type: none"> <li>Scope of the plan</li> <li>Key issues and options</li> </ul>
<b>Soundness &amp; Legal Compliance Self-Assessment (2018)</b>	<ul style="list-style-type: none"> <li>A checklist has been produced to demonstrate how the plan complies with the tests of soundness and legal compliance</li> </ul>
<b>Tower Hamlets Local Plan Strategic Policy Assessment (2017)</b>	<ul style="list-style-type: none"> <li>Sets out which policies in the Local Plan are strategic for the purpose of neighbourhood planning</li> </ul>
<b>Infrastructure Delivery Plan (2018)</b>	<ul style="list-style-type: none"> <li>Sets out what infrastructure is required to deliver planning growth in the borough</li> <li>Post regulation 19 changes in the light of representations</li> </ul>
<b>London Plan (GLA, 2016)</b>	<ul style="list-style-type: none"> <li>Current adopted version</li> </ul>
<b>New London Plan (GLA, 2017)</b>	<ul style="list-style-type: none"> <li>Draft consultation version</li> </ul>

## Evidence base documents

Key evidence base document	Purpose / justification
<b>Achieving sustainable growth</b>	
<b>Joint Strategic Needs Assessment: Spatial Planning and Health (2016)</b>	<ul style="list-style-type: none"> <li>To ensure health and wellbeing considerations are embedded within the Local Plan and ensure planning contributes towards delivering a healthier borough.</li> </ul>
<b>City Fringe Opportunity Area Planning Framework (GLA, 2015)</b>	<ul style="list-style-type: none"> <li>Sets out a framework to manage current impacts of growth and facilitate the future delivery of high quality homes, jobs and infrastructure in the area</li> </ul>
<b>Isle of Dogs &amp; South Poplar Opportunity Area Framework: Consultation Draft (GLA, 2018)</b>	<ul style="list-style-type: none"> <li>Sets out a framework to manage current impacts of growth and facilitate the future delivery of high quality homes, jobs and infrastructure in the area</li> </ul>
<b>Tower Hamlets Partnership Community Plan (2015)</b>	<ul style="list-style-type: none"> <li>The borough's long term vision, articulating local aspirations, needs and priorities.</li> </ul>
<b>Lower Lea Valley Opportunity Area Framework (GLA, 2007)</b>	<ul style="list-style-type: none"> <li>Sets out a framework to manage current impacts of growth and facilitate the future delivery of high quality homes, jobs and infrastructure in the area</li> </ul>
<b>Tower Hamlets Local Plan Viability Assessment (2018)</b>	<ul style="list-style-type: none"> <li>Update the study and methodology</li> <li>Assess/test the policies and site allocations to ensure that the scale of obligations and policy burdens does not threaten the viability of development</li> <li>Ensuring the site allocations can be delivered in tandem with waste infrastructure</li> <li>Give assurance that the sites are viable</li> </ul>
<b>Community Infrastructure Levy</b>	<ul style="list-style-type: none"> <li>Sets out the types of infrastructure projects that we will be, or may, be wholly or partly funded by CIL.</li> </ul>



<b>Key evidence base document</b>	<b>Purpose / justification</b>
<b>Regulation 123 List (2016)</b>	
<b>Health and Wellbeing Strategy 2017-2020 (2017)</b>	<ul style="list-style-type: none"> <li>Set out the priorities for action based on the health and wellbeing needs of the borough</li> </ul>
<b>Creating attractive and distinctive places</b>	
<b>Tall Buildings Study (2017)</b>	<ul style="list-style-type: none"> <li>Assess existing tall building policies in Tower Hamlets and recommend a new approach to minimise harm</li> <li>Identifies tall building zones</li> </ul>
<b>Conservation Strategy (2017)</b>	<ul style="list-style-type: none"> <li>Set out a vision to guide the conservation and enjoyment of the borough's historic environment</li> </ul>
<b>Urban Structure &amp; Characterisation Study (2009 &amp; 2016)</b>	<ul style="list-style-type: none"> <li>Identifies, analyses and characterises the urban form and structure of the borough</li> </ul>
<b>London Borough of Tower Hamlets: Conservation Area Appraisal &amp; Management Guidelines</b>	<ul style="list-style-type: none"> <li>To ensure health and wellbeing considerations are embedded within the Local Plan and ensure planning contributes towards delivering a healthier borough.</li> </ul>
<b>London View Management Framework</b>	<ul style="list-style-type: none"> <li>Provide detailed guidance on London's strategically important views</li> </ul>
<b>Views &amp; Landmarks – Topic Paper (2018)</b>	<ul style="list-style-type: none"> <li>Justification for the borough designated views and the skyline of strategic importance</li> </ul>
<b>Meeting housing needs</b>	
<b>Strategic Housing Market Assessment (2014)</b>	<ul style="list-style-type: none"> <li>Objective assessment of future housing needs (both market and affordable)</li> </ul>
<b>Strategic Housing Market Assessment Update (2017)</b>	<ul style="list-style-type: none"> <li>Update to the 2014 assessment</li> </ul>
<b>Accessible Housing Assessment (2018)</b>	<ul style="list-style-type: none"> <li>Justification for 2 lift requirement (refusals for properties with one lift, numbers rehoused from blocks with one lift, case studies)</li> <li>Further information on contributions in lieu amounts and how these contributions will be spent in order to deliver more bespoke accessible homes (via project 120).</li> </ul>
<b>Small Sites Affordable Housing Contributions Topic Paper (2017)</b>	<ul style="list-style-type: none"> <li>Additional evidence regarding the need and deliverability of affordable housing contributions from small housing schemes</li> </ul>
<b>Child Yields Calculator (2017)</b>	<ul style="list-style-type: none"> <li>A tool for estimating population yield from new housing development.</li> </ul>
<b>Housing Supplementary Planning Guidance (GLA, 2016)</b>	<ul style="list-style-type: none"> <li>Provides guidance on a range of strategic issues such as housing supply and density, build to rent developments, student accommodation and viability appraisals.</li> </ul>
<b>Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance (GLA, 2017)</b>	<ul style="list-style-type: none"> <li>Sets out the threshold approach to viability assessments, detailed guidance on viability</li> <li>assessments and a specific approach to build to rent schemes</li> </ul>
<b>Tower Hamlets Accessible Housing Register Categories - A Wheelchair Standard (2010)</b>	<ul style="list-style-type: none"> <li>Depends on the appointment of consultants to undertake the Affordable Housing Assessment</li> </ul>
<b>Gypsies and Travellers Accommodation Assessment (2016)</b>	<ul style="list-style-type: none"> <li>Assesses the current and future need for gypsy and traveller accommodation</li> </ul>
<b>Guidance for developers and viability testers on London Borough of Tower Hamlets preferred rents (2017)</b>	
<b>Housing Strategy (2016)</b>	<ul style="list-style-type: none"> <li>Sets out the strategy for improving housing conditions across the borough</li> </ul>
<b>Tower Hamlets Local Plan: Housing Delivery Strategy (2018)</b>	<ul style="list-style-type: none"> <li>Demonstration of Tower Hamlets is seeking to maximise housing output and reduce the currently anticipated delivery shortfall against the housing target</li> <li>Update to reflect new five year land supply</li> </ul>
<b>Five Year Housing Land Supply and Housing Trajectory Statement (2018)</b>	<ul style="list-style-type: none"> <li>Sets out our five-year housing supply position (2017-2022) and 15-year local plan housing trajectory (2016-2031).</li> </ul>
<b>Delivering economic growth</b>	
<b>Employment Land Review (2016)</b>	<ul style="list-style-type: none"> <li>Assesses the supply and demand balance of employment space in the borough, including future demand and the supply of sites and premises</li> </ul>
<b>Preferred Office Location Boundary Review (2017)</b>	<ul style="list-style-type: none"> <li>Defines the extent of the POL (zones A-C)</li> </ul>
<b>Growth Sectors and SMR Workspace Study (2017)</b>	<ul style="list-style-type: none"> <li>A mapping study of the borough's small business and enterprise economy, with a specific focus on economic growth sectors and the demand for and supply of SME workspace.</li> </ul>
<b>Affordable Workspace Study (2018)</b>	<ul style="list-style-type: none"> <li>Set out the justification for seeking 10% of affordable workspace within major commercial developments and how it will be effectively delivered.</li> <li>Further clarification on how the policy will be applied</li> <li>Ensuring affordable workspace requirements are viable</li> </ul>
<b>Central Activities Zone Supplementary Planning Guidance (GLA, 2016)</b>	<ul style="list-style-type: none"> <li>Guidance on the implementation of the CAZ and the north of the Isle of Dogs</li> </ul>
<b>Town Centre Retail Capacity Study (2016)</b>	<ul style="list-style-type: none"> <li>Assesses the supply and demand balance of retail and commercial leisure space in the borough.</li> </ul>



<b>Key evidence base document</b>	<b>Purpose / justification</b>
<b>Town Centre Spatial Strategy to 2017 to 2022 (2017)</b>	<ul style="list-style-type: none"> <li>Sets out our approach in managing our town centres and improving their performance</li> </ul>
<b>Town Centre Designations &amp; Policies Topic Paper (2018)</b>	<ul style="list-style-type: none"> <li>Justification for the proposed designations and thresholds (e.g. hot-food-take-aways)</li> <li>Protection of A1 retail use within town centres</li> </ul>
<b>Retail Impact Assessment Threshold (2018)</b>	<ul style="list-style-type: none"> <li>Justifies the adoption of a locally based threshold above which retail developments will be required to undertake assessment of their impact on the vitality and viability of the borough's existing centres</li> </ul>
<b>Pubs in Tower Hamlets – Evidence Study (2016)</b>	<ul style="list-style-type: none"> <li>Sets out how additional support to pubs through strengthened planning policies</li> </ul>
<b>Indoor Sports Facilities Strategy (2017)</b>	<ul style="list-style-type: none"> <li>Analysis of current and future needs for indoor sports facilities</li> </ul>
<b>Managing our waste</b>	
<b>Waste Management Evidence Base (2016)</b>	<ul style="list-style-type: none"> <li>Assesses the borough's capacity to handle current and projected arisings across all waste streams and London Plan apportionment targets.</li> </ul>
<b>Waste Management Evidence Base Review (2017)</b>	<ul style="list-style-type: none"> <li>Review the 2016 evidence and address the capacity of sites to accommodate waste &amp; provide evidence regarding agricultural waste, hazardous waste and waste water</li> </ul>
<b>Enhancing open spaces and water spaces</b>	
<b>Open Space Strategy (2017)</b>	<ul style="list-style-type: none"> <li>Quantitative and qualitative assessment of the borough's publicly accessible open spaces</li> </ul>
<b>Playing Pitches Assessment (2018)</b>	<ul style="list-style-type: none"> <li>A supply and demand assessment of playing pitch facilities in accordance with Sport England's Playing Pitch Strategy Guidance</li> </ul>
<b>Playing Pitches Action Plan (2018)</b>	<ul style="list-style-type: none"> <li>Set out the locations where specific types of playing pitches will be prioritised</li> <li>Translates the findings of the Tower Hamlets Playing Pitch Assessment into an action plan</li> </ul>
<b>Green Grid Strategy Update (2017)</b>	<ul style="list-style-type: none"> <li>Qualitative and quantitative assessment of the borough's green grid network and identifies/recommends interventions and new projects.</li> </ul>
<b>Water Space Study (2017)</b>	<ul style="list-style-type: none"> <li>Qualitative assessment of the borough's water spaces</li> </ul>
<b>Thames Strategy East (Thames Estuary Partnership, 2008)</b>	<ul style="list-style-type: none"> <li>Provides a detailed appraisal of the stretch of the River Thames running through the borough.</li> </ul>
<b>Thames Vision Project (Port of London Authority, 2016)</b>	<ul style="list-style-type: none"> <li>Sets out the collective ambition for the development of the River Thames over the next 20 years</li> </ul>
<b>Thames Estuary 2100 Plan (Environment Agency, 2012)</b>	<ul style="list-style-type: none"> <li>Sets out recommendation on how tidal flood risk should be managed to the end of the century and beyond and the actions that need to be taken in the short, medium and long term</li> </ul>
<b>Lea River Park Primer (2016)</b>	<ul style="list-style-type: none"> <li>Guidance to inform the development of the Lea River Park</li> </ul>
<b>Lea River Park Design Manual (2016)</b>	<ul style="list-style-type: none"> <li>Accompanying design guide</li> </ul>
<b>Protecting and managing our environment</b>	
<b>Local Biodiversity Plan (2014)</b>	<ul style="list-style-type: none"> <li>Sets priorities and targets for conservation of species and habitats across the borough, and provides details of what actions we will undertake to achieve these targets</li> </ul>
<b>Strategic Flood Risk Assessment (2017)</b>	<ul style="list-style-type: none"> <li>Assessment of the borough's strategic flood risk and identified development sites to ensure that allocations pass the sequential and exceptions tests.</li> </ul>
<b>The London Borough of Tower Hamlets: London Heat Map Study (2011)</b>	<ul style="list-style-type: none"> <li>Maps showing areas of highest heat demand and the locations of existing district heating/energy networks.</li> <li>Identifies potential areas for the development of further networks</li> </ul>
<b>Strategy for the Identification of Contaminated Land (2013)</b>	<ul style="list-style-type: none"> <li>Strategy for the inspection of land within the borough to determine the presence of any contaminated land</li> </ul>
<b>Carbon Policy Evidence Base (2016)</b>	<ul style="list-style-type: none"> <li>To compare the cost of the GLA's zero carbon policy (which requires 35% reduction onsite) and the Tower Hamlets current zero carbon policy (which requires 45% reduction onsite)</li> </ul>
<b>Carbon Offset Fund Study (2016)</b>	<ul style="list-style-type: none"> <li>Investigates how a carbon offset fund could help new development comply with planning policies and fund carbon saving projects near or off site</li> </ul>
<b>Review of Sites of Nature Conservation Importance in Tower Hamlets (2016)</b>	<ul style="list-style-type: none"> <li>Review of existing SINC's</li> <li>Ensure the revised Policies Map includes up-to-date SINC's.</li> </ul>
<b>Air Quality Action Plan (2017-22)</b>	<ul style="list-style-type: none"> <li>Adopted in late 2017 – replaces the consultation version</li> </ul>
<b>Connectivity and travel choice</b>	
<b>Strategic Transport Assessment (2016)</b>	<ul style="list-style-type: none"> <li>Analyses the current and committed provision of transport and determine its capacity to support the projected number of new homes and jobs in the borough.</li> </ul>
<b>Parking and Freight Study (2017)</b>	<ul style="list-style-type: none"> <li>Assesses the impact of parking standards to ensure that growth does not have an unduly detrimental impact on the safe and efficient operation of the highway network and local air quality</li> </ul>
<b>Tower Hamlets – a Cycling Borough (2016)</b>	<ul style="list-style-type: none"> <li>Sets out our plans and aspirations for cycling to 2025</li> </ul>
<b>Site Selection Methodology Report (2018)</b>	<ul style="list-style-type: none"> <li>Viability of the sites and the timing and phasing of anticipated delivery (parts of which will feed into the Spatial Assessment Need for Schools)</li> <li>More detailed explanation of the reasons for choosing sites and rejecting alternatives</li> <li>Greater certainty over the timing and phasing of development especially in relation to infrastructure provision</li> </ul>

<b>Key evidence base document</b>	<b>Purpose / justification</b>
<b>Site Allocations - Sequential and Exceptions Tests (2017)</b>	<ul style="list-style-type: none"> <li>• Sets out the sequential and exception tests for the allocated sites</li> </ul>
<b>Site Allocations – Heritage Assessment (2018)</b>	<ul style="list-style-type: none"> <li>• Demonstrates how the historic environment has been considered in the site allocation methodology and selection process.</li> <li>• Refer to the archaeology assessment</li> <li>• Assesses the likely impact on heritage assets and how any harm can be mitigated where relevant</li> </ul>
<b>Whitechapel Masterplan Vision Supplementary Planning Document (2013)</b>	<ul style="list-style-type: none"> <li>• Sets out a framework to guide new development within the Whitechapel area up to 2028</li> </ul>
<b>South Quay Masterplan Supplementary Planning Document (2015)</b>	<ul style="list-style-type: none"> <li>• Sets out a framework to guide new development within the South Quay area up to 2025</li> </ul>
<b>Ailsa Street Development Framework (2016)</b>	<ul style="list-style-type: none"> <li>• Sets out a framework to guide new development within the Ailsa Street up to 2025</li> </ul>
<b>Fish Island Area Action Plan (2015)</b>	<ul style="list-style-type: none"> <li>• Sets out a framework to guide the regeneration and future development of Fish Island to 2025</li> </ul>
<b>Spatial Assessment for Schools (2018)</b>	<ul style="list-style-type: none"> <li>• Aims to further supports the approach taken to allocating schools and determining their location across the borough.</li> </ul>

## APPENDIX 5 – LOCAL PLAN RISK REGISTER

Risk	Triggers	Consequences	RAG (Red = 9+ Amber = 4-8 Green 0-3)	Current Risk Score (4 is high and 1 is low)	Likelihood	Overall score	Target score (following mitigation)	Mitigation Method	Lead Officer
Programme delays or stalls	Political change (national) – a further general election prior to adoption of the new Local Plan results in a new government which may bring in significant changes to current policy and statutory requirements for plan making process	Failure to meet the council's statutory duty to have an up-to-date Local Plan within programme timeframes that have been established at the start of the project		4	4	16	8	Keep abreast of planning press and ministerial announcements following any election	Project manager
	Political change (borough) - following the Mayoral and ward elections in 2018 there is a change of Mayor and/or political make-up of the Council	Political priorities shift and new Cabinet members take time to get up-to-speed with key issues, or require substantial amendments to the Local Plan		4	3	12	6	Set up regular briefing sessions with Mayor, Lead Member and Cabinet members to identify key issues	
	Delays in internal procurement process	Procurement of additional evidence or support for EiP is delayed		4	3	12	6	Close working with procurement colleagues	
	Poor governance structure	Project milestones slip and expectations of politicians and senior officers are not met		4	2	8	4	Establish clear governance structure during project initiation and agree this with project sponsor	

	Poor project management (e.g. resources and time management)	Project milestones slip and expectations of politicians and senior officers are not met		4	2	8	4	Regular and ongoing monitoring by the project manager
	Resourcing and changes to personnel in lead and contributing/supporting teams	Project milestones slip and expectations of politicians and senior officers are not met, or expertise is lost prior to EiP		4	4	16	8	Setting realistic project timeframes and rigorous monitoring and contingency
Failure to deliver the vision to meet both political and community aspirations	Poor communication with locals and the community	Lacking political and key stakeholders' support for vision and policy direction, leading to strong objections and challenges at examination stage		2	2	4	2	Ensure the governance structure clearly reflects the reporting process, which involves members
	Poor presentation of the Regulation 19 consultation documents	Lacking political and key stakeholders' support for vision and policy direction, leading to strong objections and challenges at examination stage		2	2	4	2	Prepare an engagement and consultation strategy during the scoping stage and keep it under review
Failure to fulfil the duty to cooperate	Poor communication with stakeholders and neighbouring authorities	The plan will be found unsound during the examination which will delay delivery of the programme		2	2	4	2	Liaise with neighbouring authorities to ensure that strategic cross-boundary issues are identified and any cross-boundary impacts are assessed prior to EiP

		The Council's reputation may be damaged by poor media coverage		2	2	4	2	All the actions following discussions with neighbouring authorities should be evidenced alongside the plan making process
Poor presentation of the final published documents	Inadequate time and resources allocated to this part of project results in failure to produce well-branded documents	Impacts negatively on the reception of the document		3	1	3	2	Allocation of adequate time and financial resources for high quality desktop publishing of document as part of project plan
Failure to develop a comprehensive evidence base to support the Local Plan	Inadequate time and resources allocated to this part of the project	The plan will be found unsound during the examination which will delay delivery of the programme		4	2	6	3	Close working with council colleagues and stakeholders throughout project to ensure all evidence base requirements have been identified

	Failure to have fully identified all necessary evidence base requirements and emergence of new evidence base requirements	The plan will be found unsound during the examination which will delay delivery of the programme		4	2	6	3	Close working with council colleagues and stakeholders throughout project to ensure all evidence base requirements have been identified
	Failure to secure sufficient budget to commission all necessary additional evidence or external support to defend the Local Plan at EiP	The plan will be found unsound during the examination which will delay delivery of the programme		4	2	6	3	Close working with council colleagues and stakeholders throughout project to ensure all evidence base requirements have been identified
Failure to have fully understood current legislation and requirements for policies during drafting stages	Submission of weak policies that are challenged at Regulation 19 consultation and EiP	The plan will be found unsound during the examination which will delay delivery of the programme		4	2	6	3	Experienced project managers in place to lead on policy areas