

LONDON BOROUGH OF TOWER HAMLETS

TOWER HAMLETS DRAFT LOCAL PLAN 2031

Managing the Growth & Sharing the
Benefits

– Consultation document

Strategic Planning – Plan Making

This is a Regulation 18 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

Tower Hamlets “Our Borough, Our Plan, 2018-2031 – A New Local Plan Draft Document” (from here on, the “Draft Local Plan”) is being consulted under Regulation 18 of the Town and Country Planning Act (Local Plan (England) Regulations (2012)).

The Draft Local Plan presents, for your consideration and comment, the Council’s draft spatial vision and objectives for development in the borough to 2031. They are followed by detailed draft planning policies and potential Site Allocations.

Comments on the Draft Local Plan are invited from all those with an interest in the future of Tower Hamlets. All comments received will be taken into account and will help to inform amended version called the Proposed Submission Local Plan, which will be published in Spring 2017.

You will be able to find all information relating to this consultation, including the Draft Local Plan and supporting documents, on the Council’s website www.towerhamlets.gov.uk/localplan. Hard copies of the Draft Local Plan are also available at the Council Office at Mulberry Place and in all Tower Hamlets libraries and Idea Stores.

When and How to Respond

A public consultation on the Draft Local Plan is scheduled to run from **Friday 11 November 2016 to Monday 2 January 2017**.

Comments must be made in writing and received no later than 2 January 2017. In line with national regulations, please note that all comments received will be made available to the public and that anonymous responses cannot be considered.

The Council encourages the use of our online consultation portal for electronic responses. This will help us to better process and acknowledge your feedback to inform the next iteration of the Local Plan.

Any written representations should be sent to the following freepost address:

FREEPOST
Local Plan Consultation
D&R Strategic Planning
London Borough of Tower Hamlets
PO BOX 55739
London E14 1BY

For any help please contact the Plan Making at localplan@towerhamlets.gov.uk (please enter “Local Plan” in the subject), on 0207 364 5009 or via Twitter: @TowerHamletsNow

During the consultation period there will also be a series of consultation events at various locations around the borough to further inform you about the content of the Draft Local Plan. Please see overpage for a list of the public exhibition and drop in sessions currently scheduled. For the most up-to-date information on the consultation events please see the Council’s website www.towerhamlets.gov.uk/localplan.

Draft Local Plan: public consultation events (including exhibitions & drop in sessions and workshops)

Date	Location	Time	Address
Thursday 24/11	Idea Store, Crisp Street	12:30 – 15:30	15 Market Square, London, E14 6AQ
Saturday 03/12	V & A Museum of Childhood, Bethnal Green	10:00 - 13:00	Cambridge Heath Road, London E2 9PA
Wednesday 07/12	Alpha Grove Community Centre	17:30 – 20:30	Alpha Grove, London, E14 8LH
Wednesday 14/12	Idea Store, Whitechapel	17:30 – 20:30	321 Whitechapel Road, London, E1 1BU
Saturday 10/12	Idea Store, Bow	10:00 – 13:00	1 Gladstone Place, Roman Road, London, E3 5ES
TBC	The Space, Isle of Dog	TBC	269 West Ferry Road, E14 3RS

MAYOR'S FOREWORD



Mayor's Foreword

At the end of last year, we consulted on 'Our Borough, Our Plan: A New Local Plan First Steps'. This document provided an overview of the challenges and opportunities facing the borough, now, and as envisaged over the next 15 years. It also outlined an initial approach as to how to address these challenges and maximise our opportunities, through our planning approach.

We received over 1,235 individual comments on the specific topic areas from a wide range of stakeholders including residents, community groups, businesses, developers and organisations. I would like to take this opportunity to thank you for engaging with us during the consultation events and providing us with such useful feedback. The summary of how these comments have been addressed is available on our website [\[insert the link\]](#).

The key concern raised, which I also share, are the scale and pace of development and how the planning process can ensure that Tower Hamlets can accommodate this level of growth and remain a liveable and thriving borough. Another concern was ensuring that all our residents benefit from the opportunities growth brings to the borough, through accessing housing, training or employment.

'Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits', has been informed by these consultation responses and our emerging evidence base to take the development of our Local Plan one step further. This document contains our preferred spatial vision, planning strategy and policies.

Within national and regional policy frameworks, we have sought to address our local challenges, whilst maximising our opportunities to the benefit of all our residents. This draft plan contains policies to ensure that new developments are accompanied by the required additional infrastructure and services, policies that protect and enhance the unique elements of our borough and policies which provide a wide range of employment space and homes.

While this document looks more like a Local Plan, it is not the final document, and changes will again be made to it, to reflect the responses we receive during this consultation. I would therefore encourage everyone interested in the future of Tower Hamlets to again let us know your views on the proposals outlined in this document, so that we can ensure we meet the needs of all stakeholders in the borough and develop the best possible Local Plan, to help guide and manage future growth and development in our borough.

A handwritten signature in black ink, appearing to read 'John Biggs', with a stylized flourish at the end.

John Biggs
Mayor of Tower Hamlets

CHAPTER ONE: INTRODUCTION

The Local Plan

The Local Plan is the borough’s own planning rule book that the Council prepares in consultation with local residents, businesses, landowners, neighbouring boroughs, regional government, statutory bodies and other interested stakeholders.

The purpose of a Local Plan is to positively plan for and manage future development in the borough. It does this by setting out the vision for the future of Tower Hamlets and how it can be implemented. To help deliver this vision new developments need to meet the requirements of a range of strategic and development management policies, together with site allocation policies. This will help ensure that development is sustainable – balancing competing requirements to meet the needs of the local community and delivering the right level and type of development in the right locations.

The role of the Local Plan is to also demonstrate how the Council is responsibly planning for the growth demands of the current and future population of the Borough. In doing so, the Local Plan must respond positively to the minimum development targets for housing and jobs set out in the London Plan to 2025.

Together, the adopted Local Plan and the London Plan (2015), form the Development Plan for the London Borough of Tower Hamlets. The Development Plan is used to help determine planning applications for new development in the Borough. In its most simple form, where planning applications positively address the policies in the Development Plan they are recommended for approval and where they do not meet the requirements of policies in the Development Plan they are recommended for refusal. In making its decisions, the Council must also consider other planning ‘material considerations’ such as the policies in the National Planning Policy Framework (NPPF) which also need to be taken into account.

Figure 1 below illustrates the Development Plan and other material considerations for planning decisions made by the London Borough of Tower Hamlets.

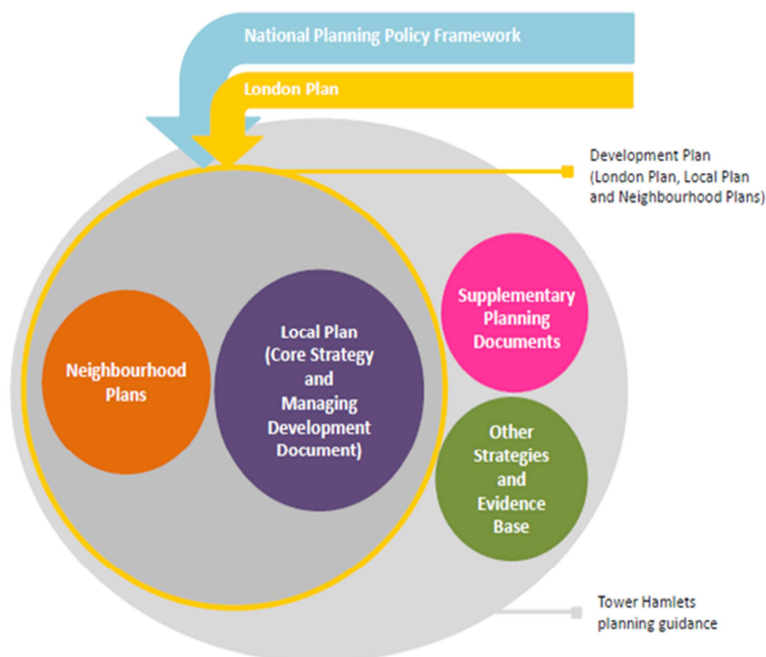


Figure 1 A Planning Policy Framework for London Borough of Tower Hamlets

A new Local Plan for Tower Hamlets

The current Tower Hamlets Local Plan is comprised of the Core Strategy (2010) and the Managing Development Document (2013). Since 2010, the borough has undergone significant changes, and experienced a high level of growth and development. This has been influenced by national, regional and local trends and policy changes. Managing and responding to this degree of change requires a new Local Plan for the borough.

National Drivers

Trends

The acute national housing shortage and resulting increasing affordability gap is a significant national trend, but it is particularly strongly felt in London and the South East. It is estimated that England needs to build an additional 232,000 to 300,000 new units per year, to meet current shortfalls and future expected need, a level of house building not reached since the late 1970s and two to three times current supply (Parliament, 2015).

A key economic trend is the impact of the recent EU referendum result, which has resulted in economic uncertainty, which may have local impacts. Through the Plan-Monitor-Manage approach, the Local Plan will respond to any changes in economic circumstances. The City Fringe and Canary Wharf are strategically important employment locations for London and are the location of the headquarters for a large number of multinational businesses. As such the businesses in Tower Hamlets play a major role in both London and the UK's Economy and are influenced by national and international factors.

Policy

The Managing Development Document was produced in accordance with the National Planning Policy Framework 2012, however there have been a number of subsequent changes made to the Planning Practice Guidance, which supports the National Planning Policy Framework, including to affordable housing provision, gypsies and travellers accommodation and waste management, which this new Local Plan will have to address.

It is worth noting that the government has proposed changes to the NPPF in the document – “Consultation on Proposed Changes to National Planning Policy (December 2015)”. The proposed changes include:

- Amendments to the definition of affordable housing, to include other products such as Starter Homes
- Support for permission in principle for brownfield sites¹, with an emphasis on delivering Starter Homes
- Increases to residential density around commuter hubs
- Enabling the building of Starter Homes, by lowering the levels of protection on industrial and commercial land, and sites currently occupied by retail and infrastructure

It is currently not clear what the Government's next steps are for the changes proposed or even whether the proposed changes will be taken forward. This version of the Draft Local Plan has therefore not incorporated the proposals.

In addition, the government approved the Housing and Planning Act in May 2016. Much of its relevant detail regarding the proposed changes is yet to emerge, however it is clear that this will have implications on regional and local planning policies and in particular on affordable housing policies. Until secondary legislation is published detailing the exact nature of the changes, it is difficult to

¹ One of the proposals was for Councils, through the development of new Local Plans, to provide planning in principle outlines. This Local Plan has not taken this approach, instead retaining Site Allocations, as Tower Hamlets does not consider it locally appropriate, due to the nature of development in this borough.

anticipate the exact nature of the impact and consequences for the new Local Plan. Through the regular Local Plan review process, any emerging legislative detail and measures will be incorporated.

Regional Drivers

Trends

London's expanding population, driven by internal and external immigration, is a key regional trend. By 2041 London's population is set to increase to approximately 10.5m inhabitants. Alongside this growth in population is a large growth in employment. Total London jobs are projected to increase to from 4.9 million in 2011 to 6.3 million in 2050. Accommodating and supporting this level of growth, through housing, employment space and infrastructure, within London's defined boundaries is a key challenge. Of importance to Tower Hamlets, are the "City in the East Vision", which sees East London as a key location for employment and housing growth, and the Housing Zone designations, which seek to speed up the delivery of housing.

Following the election of Sadiq Khan as the new Mayor of London, in May 2016, a number of key political priorities have emerged. These include addressing London's acute housing affordability gap through the promotion of delivering a greater quantum of affordable housing and implementing new types of affordable products. Another key priority has been improving London's air quality and promoting London as an open and thriving center for business and culture.

Policy

The new London Plan was adopted in 2015, and set a new housing target for the borough of a minimum of 3,931 new homes each year. This adds up to a requirement for London Borough of Tower Hamlets to deliver a total of 39,314 additional new homes in the borough over a ten year period from 2015 to 2025. While this housing target is greater than our locally assessed housing need, the Council is required by the NPPF to also consider and help meet the needs of London, as well as more locally specific needs.

It is anticipated that a new Draft London Plan will be published in Autumn 2017 and new London Plan adopted in 2019. London Borough of Tower Hamlets is working closely with the Greater London Authority (GLA) to ensure the policies in the Draft Local Plan takes account of emerging evidence and policy direction and is flexibly worded where necessary to adapt to change. Through the regular Local Plan review process, any changes required as a result of the new London Plan can be incorporated.

This new London Plan also allocated three Opportunity Areas in the borough: City Fringe, Isle of Dogs and South Poplar and Lower Lea Valley (which also includes part of London Borough of Hackney and Newham) (see Figure 15). As a result more than 50% of the borough is identified as an Opportunity Area for growth in London.



Figure 15 Location of London's Plan's Opportunity Areas in Tower Hamlets (-to be updated)

Local Drivers

Trends

The borough's population has grown significantly since the last Local Plan. Tower Hamlets has recorded the fastest growing population in the country in recent years, growing almost 30% between the 2001 and 2011 Census. This growth is expected to continue and is projected to increase from 296,300 in 2016 to 374,000 in 2026, a 26% increase. This level of population growth has been due, in the main, to high housing growth. This has resulted in a huge growth in demand for transport infrastructure, local services and pressure on the local environment.

The borough has also seen high economic growth. At the start of this millennium, total jobs in the borough totaled 160,000, but by 2015 the total had risen to 302,000, growth of approximately 142,000, a 90% increase in just 15 years. This was substantial growth compared to that for London as a whole (an increase of 20%). However, whilst this high level of growth has brought a number of regeneration and redevelopment benefits, high deprivation levels remain in parts of the borough, indicating that these benefits have not been spread across the borough or felt by all residents.

Policy

Many of these emerging local trends and the resulting opportunities and challenges have been

identified and addressed in the Tower Hamlets Partnership Community Plan. This was prepared by the Tower Hamlets Partnership and adopted in 2015. It provides the overarching long-term vision, addressing local aspirations, needs and priorities for the borough. It informs all other strategies and delivery plans of the partnership, including the Council’s Local Plan.

The Local Plan will contribute towards delivering the Community Plan objectives, focusing in particular on the new Cross-cutting priorities of ‘Empowering residents and building resilience’ ‘Promoting healthier lives’, ‘Increasing employment’ and ‘Responding to population growth’. It will also contribute to the commitment to “One Tower Hamlets”, which is:

- Reducing inequality
- Promoting community cohesion
- Enable community leadership and engagement

The Community Plan will evolve to reflect the changing priorities and concerns of the local community. The Local Plan will reflect these changes through its regular review.

Scope of the New Local Plan: Area and timeframe

The new Local Plan provides planning policies for the majority of the borough. There are areas that need to be considered using other planning guidance:

London Legacy Development Corporation (LLDC)

The LLDC has been established since 2012, it has its own approved Local Plan (2015) that provides planning policies for all development within the Hackney Wick/Fish Island and Bromley-by-Bow (figure 2 below), with the exception of waste management which remains the responsibility of London Borough of Tower Hamlets. Planning applications for waste management related development in the LLDC area should therefore refer to the Tower Hamlets Local Plan.

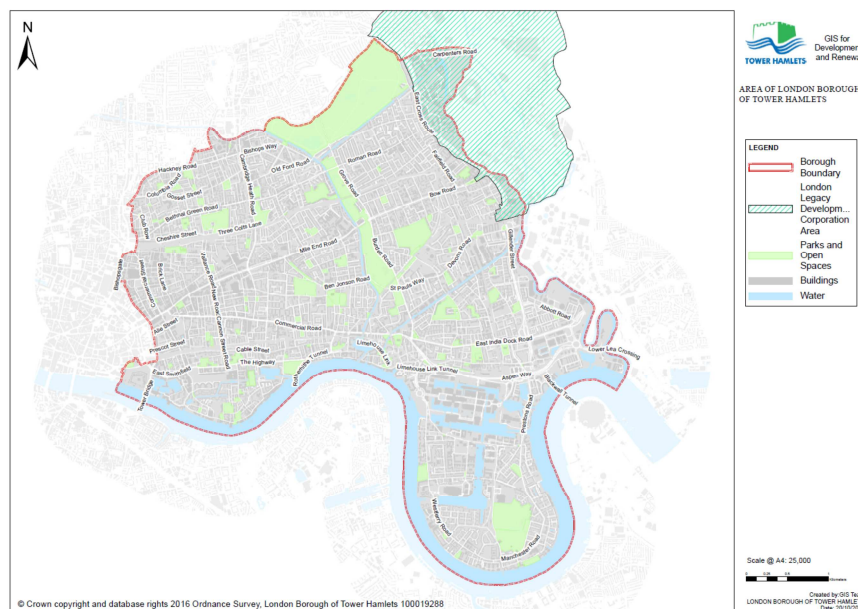


Figure 2 London Borough of Tower Hamlets Planning Area

Neighbourhood Plans

Neighbourhood Planning introduces a new layer of spatial planning policy to complement the Council’s Local Plan. Once a Neighbourhood Plan is adopted it forms part of the Development Plan for the borough. It is a community-led document, produced by a Neighbourhood Forum, which enables local communities to directly shape and promote development in their area. The Council has a role in supporting interested groups by providing technical advice and administrative support.

The policies in Neighbourhood Plans in the borough need to be in general conformity with the policies in the Development Plan.

The Council has designated Neighbourhood Forums in East Shoreditch, Spitalfields, Isle of Dogs and Limehouse and these local groups plan to have approved or 'made' Neighbourhood Plans in their areas either in advance of or shortly after the adoption of the new Local Plan in winter 2017/18.

Timeframe

The new Local Plan covers a fifteen year period 2016 to 2031. It is expected that the new Local Plan will be adopted in early 2018, at which point it will supersede the existing Local Plan (Core Strategy, 2010 and Managing Development Document, 2013).

Producing the new Local Plan

The preparation of a new Local Plan must follow nationally set legal and procedural requirements that dictate the stages of the plan preparation, who should be consulted and when, and what information is required to support the Local Plan to ensure it is fit for purpose and 'sound'. In particular the Tower Hamlets Local Plan must be prepared in accordance with the National Planning Policy Framework and must seek to meet the requirements of the London Plan.

The Council's new Local Plan will then be independently examined by a Government appointed Planning Inspector who will consider whether these requirements have been met, and whether it is sound. To be sound the new Local Plan must be:

- **Positively prepared:** for example that it positively seeks to meet their requirements of the London Plan;
- **Justified:** that the policies in the Local Plan are supported by evidence and are reasonably robust;
- **Effective:** that the policies in the plan can be delivered and have been formulated on the basis of effective joint working with partners; and
- **Consistent with national policy:** that it has been prepared in accordance with the National Planning Policy Framework (NPPF)

The Council considers that the Draft Local Plan has been prepared in accordance with the appropriate legal and procedural requirements, including the requirements of the National Planning Policy Framework (NPPF 2012) and the Town and Country Planning (England) Regulations 2012.

Evidence Base

The development of the Draft Local Plan also builds on a substantial body of existing work, in particular the content of the Tower Hamlets Partnership Community Plan 2015, which identifies the main pressures and priorities for the borough, and the policies in the existing Local Plan (Managing Development Document, 2013), which are development management focused and was examined, found sound and adopted relatively recently in 2013.

The content of the Draft Local Plan has also been informed by the associated emerging evidence studies and the sustainability of the draft content has been appraised by an Integrated Impact Assessment (IIA). In addition, the content of the Draft Local Plan has been shaped through engagement with the public, our councillors and with key stakeholders in line with the Duty to Cooperate. More information on this is illustrated and summarised in the section that follows.



Figure 3 Inputs into the Tower Hamlets 'Local Plan'

National Planning Policy Framework

The National Planning Policy Framework (NPPF) is one of the most important national planning documents that informed the preparation of the new Local Plan. Councils must have regard to the NPPF when drawing up their plans and it is a material consideration in decision making. The NPPF is supported by more detailed National Planning Practice Guidance, which has been regularly updated.

At its core the NPPF is the 'presumption in favour of sustainable development'. This requires that for plan making:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF.

The London Plan

The regional plan for London Borough of Tower Hamlets is the London Plan. This is an integrated strategic planning strategy that covers all London boroughs. It demonstrates how London is meeting the requirements of the National Planning Policy Framework (NPPF) to support sustainable growth and does this through its economic, social and environmental policies that help guide and manage growth in London from 2015 to 2025 and beyond. The preparation of any Local Plan in London is required to be in general conformity with these overarching policies and should help deliver the London Plan vision. The relevant role of the new Local Plan is to show how the vision and policies will be delivered and detailed at a local level.

Evidence Base

The content of the Draft Local Plan is supported by a number of evidence documents, which are listed in Appendix 4 and are available on the Council's website. Most of these studies are technical in their

nature and include Strategic Transport Assessment, the Integrated Impact Assessment (IIA) and the Strategic Flood Risk Assessment (SFRA). In order to make it assessable for all, the Council has prepared a 'Summary of Supporting Studies' report which summarises the key outputs and recommendations of each relevant study. These documents form part of the consultation and may be amended post consultation.

A number of evidence base documents are still under development and will inform the next version of the Draft Local Plan. These include:

Table 1 Emerging evidence base study

Supporting Study	Description	Status
Air Quality Action Plan	<p>The aim of the Tower Hamlets Air Quality Action Plan is to improve the air quality in the Borough. The borough is the whole of the borough identified as an Air Quality Management Area. Of particular concern are the levels of Nitrogen Dioxide and Particulates (PM10 and PM2.5), which in parts of the borough, exceed World Health Organisation (WHO) guideline limits (and in the case of Nitrogen Dioxide EU safe legal limits).</p> <p>The Plan will examine the various measures for improving air quality assesses and propose the most cost effective in terms of improving air quality. These will be actions for a number of internal and external departments and organisations.</p>	Currently being updated and will be published in April 2017.
Green Grid Strategy Update	An updated Green Grid Strategy has been identified by the Plan Making team as a key piece of evidence to underpin the development of the Council's new Local Plan. The strategy will inform specific green grid and open space policies and will support other strategies and guidance, like the Council's Open Space Strategy. It will also identify key interventions which can be delivered by potential site allocations and future investments in the borough.	Currently being updated and will be published in April 2017.
Playing Pitches Study	A Playing Pitch Needs Assessment is underway to identify and assess the outdoor playing pitches in the borough.	Currently being updated and will be produced in April/May 2017.
Open Space Strategy Update	An Open Space Strategy is currently being developed in-house to address future preservation and development of open spaces in Tower Hamlets.	Currently being updated and will be produced in May 2017.

Note: The list is not exhaustive. New evidence base studies may be identified following the public consultation.

Integrated Impact Assessment (IIA) and Habitat Regulation Assessment

The IIA fulfils the requirements of the following:

- A Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (in a manner that incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations);
- The Health Impact Assessment; and
- The Equalities Impact Assessment;

Stakeholders were consulted on the SA/SEA Scoping Report between November 2015 and January 2016, in accordance with regulation 12(5) of the SEA Regulations, which presented the scope of the IIA for comment. Consultation responses have been used to amend the IIA's sustainability objectives.

During the development of the draft New Local Plan, each version of the draft policies and site allocations have been appraised against these sustainability objectives. These assessments provided recommendations on how the sustainability of the Draft Local Plan could be improved. Where a number of policy options were considered (as outlined in appendix 12), the IIA has also assessed each option against the sustainability objectives. These recommendations have been taken into account in the drafting of this plan.

The IIA has also assessed the draft Local Plan against the requirements and policy directions outlined in National and Regional Policy. Where the Draft Local Plan has made a decision to take a more local approach and interpretation of London Plan's strategic policies in order to meet the Draft Local Plan's objectives, the rationale for this is explained in the supporting text and reasoned justification for the policy and the sustainability of this approach has also been appraised as part of the IIA process.

A Habitats Regulation Assessment (HRA) screening exercise is also being carried out in accordance with European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive'). The role of this exercise is to determine whether the emerging content of the draft Local Plan will generate an adverse impact on the integrity of any European Sites. For Tower Hamlets, it is concluded that a full Screening Report will not be required for the next version of the draft Local Plan.

Duty to Co-operate

The legal and procedural requirements require local planning authorities and identified public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation to address strategic cross boundary matters.

The Council engaged positively a wide range of public bodies and neighbouring authorities in the preparation of the Draft Local Plan, including the Greater London Authority (GLA), Transport for London (TfL), London Legacy Development Corporation (LLDC) and neighbouring boroughs on cross-boundary planning issues. This constructive dialogue over the course of the plan preparation has led to an improved overall content and policy detail. The Duty to Co-operate Log, which forms part of the evidence base to the Draft Local Plan, demonstrates how the Council has co-operated effectively.

Public Consultation

The Council is committed to involving the public in the decision-making process. It does so in line with the Council's adopted Statement of Community Involvement (SCI). This sets out how the public should be involved in the formal stage of the preparation of the new Local Plan, amongst other planning related matters.

The Draft Local Plan has been informed by from the feedback received from informal consultation on "Our Borough, Our Plan - A New Local Plan First Steps (December 2015)", which ran from December 2015 to February 2016 and other subsequent informal engagement exercises with stakeholders. Through this process, the Council has exceeded its commitment under the approved SCI and has undertaken a considerable amount of public engagement on the potential content of the Draft Local Plan in advance of this Regulation 18 formal public consultation. A consultation report that summarises the key outputs from this engagement to date can be found on the Council's website: [insert a link]

The Council is committed to working positively with the Borough's designated Neighbourhood Forums responsible for the following Neighbourhood Plan Areas: East Shoreditch, Spitalfields Neighbourhood Business Area, Isle of Dogs and Limehouse and has hosted focused engagement with these forums to inform the content of the Draft Local Plan. The Council looks forward to continuing this positive relationship as the new Local Plan progresses to adoption.

The structure of the Draft Local Plan

This Draft local Plan has been written as succinctly as possible. Therefore, the content of the Draft Local Plan does not look to re-iterate national or regional policy. The intention is that the policies in

the new Local Plan should be read in conjunction with the National Planning Policy Framework (NPPF) associated National Planning Practice Guidance (NPPG) and the London Plan (2015) and any other relevant material considerations including adopted Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD). The structure of the Draft Local Plan is set out in Figure 4 below.

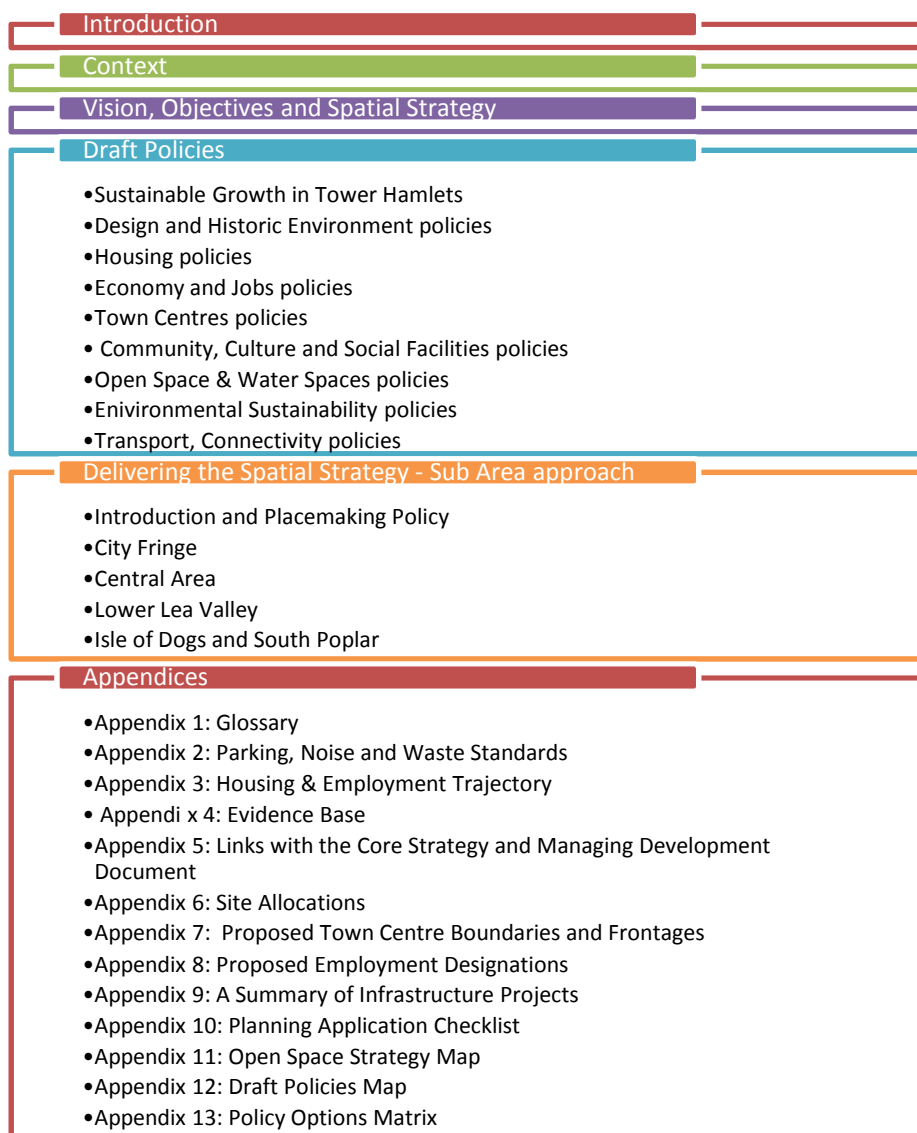


Figure 4 The structure of the Draft Local Plan

Status of the Draft Local Plan

According to the National Planning Policy Framework (2012) (NPPF), from the day of publication, the Council may give weight to policies in emerging plans.

At this stage the Council does not intend to apply any weight to the emerging policies in the Draft Local Plan as it will continue to evolve in response to the public consultation and the expected publication of further national secondary planning legislation and guidance.

The Council will therefore continue to give full weight to policies in the existing Local Plan (Core Strategy (2010) and Managing Development Document (2013)).

Monitoring the Draft Local Plan

In order to ensure the policies in the Local Plan achieves the key objectives to support the delivery of the spatial vision for Tower Hamlets, the Council will develop indicators against which it can measure the success of the strategies and policies within the Local Plan. Some of these indicators have already been identified in the Sustainability Appraisal Scoping Report (2015). This will help to identify any potential need to review part or all of the Local Plan. Monitoring of these indicators will be reported through the Tower Hamlets' Monitoring Report.

Monitoring the Local Plan implementation is a vital part of the Plan Making process. It is regarded as an independent project which requires collaboration between teams across the Council. Over the coming months officers will continue to undertake further work to identify what social, economic and environmental indicators might be suitable for the proposed policies contained within the draft Local Plan document.

Next Steps

The Draft Local Plan is not a final Local Plan. Following feedback received in response to this public consultation, the Council will take into account all representations made and prepare an improved version of the new Local Plan, called the Proposed Submission Local Plan.

The Proposed Submission Local Plan will be published in spring/summer 2017. The content of the document will represent what the Council considers to be appropriate for submission to the Government's Planning Inspectorate for examination. At this point, the public will be asked for their final thoughts on the content of the Proposed Submission Local Plan and in particular on whether or not it has been soundly prepared. The Council is then responsible for gathering these comments together and preparing a summary of the main comments made. This, along with an update Submission Local Plan, will then be sent to the Government's Planning Inspectorate.

The Planning Inspectorate will then appoint an independent planning inspector who will examine the soundness of the Submission Local Plan to determine whether it satisfies the relevant statutory requirements and whether it is sound. Following the public examination the Inspector will issue a report making recommendations as to the soundness of the Local Plan which the Council must publish. Upon the receipt of the report the authority will look to formally adopt the Local Plan in line with the Inspector's recommendations at Full Council. This process is illustrated below.

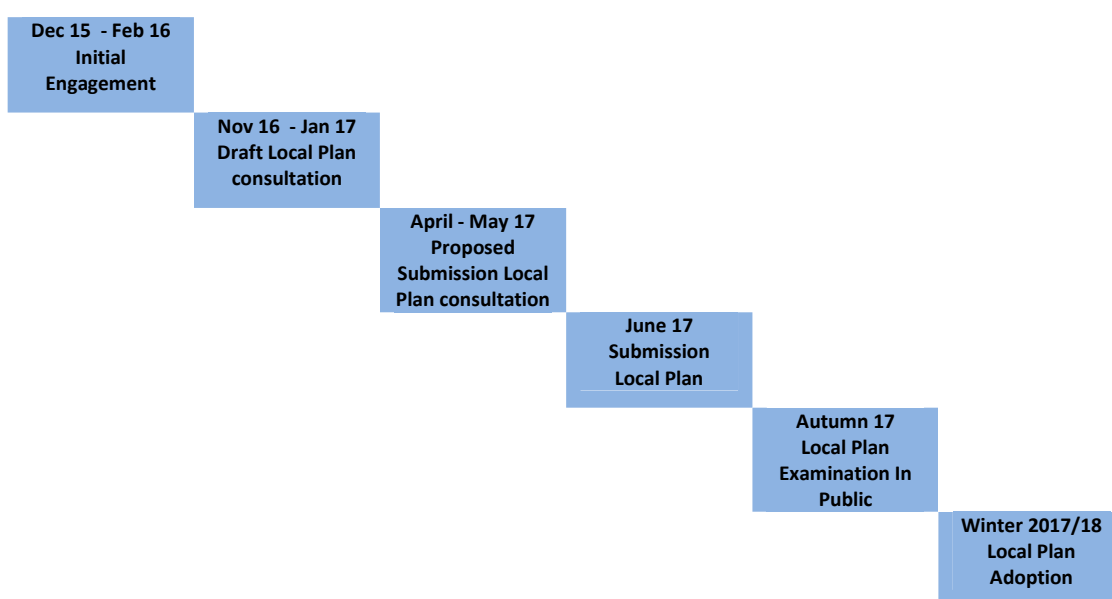


Figure 3 Indicative timetable for the Local Plan Preparation

CHAPTER TWO: SETTING THE SCENE

The Borough Context

Tower Hamlets remains a borough of diverse people and distinct places, and both the borough's population and landscapes are changing rapidly. Below sets out the borough and some of these key changes taking place and the impacts, as well as how we plan for the future of the borough and its people.

Place

Tower Hamlets in London

Tower Hamlets is an inner London borough which shares boundaries with the City of London and the London Boroughs of Newham and Hackney. The east side of Tower Hamlets is bordered by River Lea, and part of the borough is now in the planning authority remit of the London Legacy Development Corporation (LLDC). The River Thames flows along the south of the borough separating it from the Royal Borough of Greenwich, the London Borough of Lewisham and the London Borough of Southwark (See Figure 6 below).

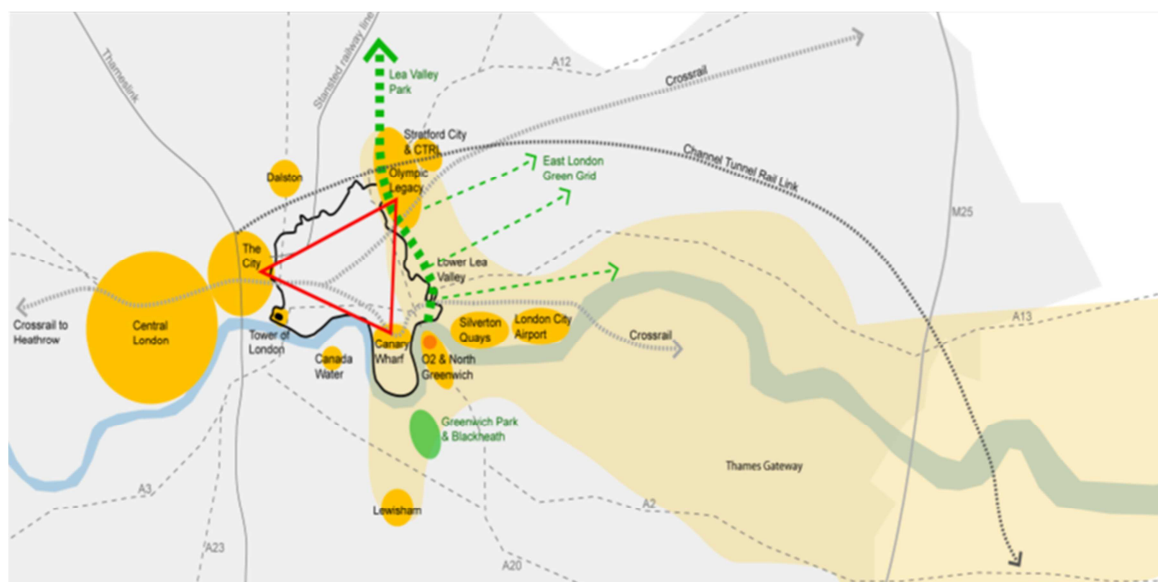


Figure 6 Tower Hamlets' position in London and relationship to neighbouring areas

Tower Hamlets sits in an important strategic location for London by linking inner London with the rest of the Thames Gateway growth corridor. The east of the borough forms part of the Olympic Legacy Area and this part of the Borough and wider area has, and will, continue to benefit from the Olympic Legacy's projects and investment. To the west of the borough is London's Square Mile – the City. This area is also home to a number of London's major tourist attractions including the Tower of London, Brick Lane, Petticoat Lane Market and Spitalfields Market.

Tower Hamlets has one of the most dynamic economies in the country. Approximately 11,440 local businesses provide approximately 251,000 jobs in the borough. The City Fringe/ Whitechapel and Canary Wharf/Isle of Dogs areas account for the majority of all employment in Tower Hamlets and are strategically important employment locations for London and the area serves as the headquarters for a large number of multinational businesses. The borough also has a strong small enterprise economy. Over 95% of businesses in Tower Hamlets are micro and small businesses employing fewer than 49 employees. The large number of SME is considered an identifiable part of the Borough's economic profile and considered important to the employment of local people in the Borough. The new Local Plan provides an opportunity to support the on-going growth of these sectors, ensuring they continue to serve their strategic role for the regional and national economy.

A borough of distinct and unique 'places'

Tower Hamlets is made up of 24 distinct and unique places each with their own identity and character (see Figure 7 below). These places have evolved from a series of historic hamlets into a densely populated part of inner East London. Each of the borough's 24 Places are defined by their individual characters, which comprise of recognised Conservation Areas, town centres and assets of historic, environmental and community value including open spaces, waterways, streetscapes and views. The new Local Plan provides an opportunity to continue to protect and enhance these distinct 'places'.

The Core Strategy (2010) undertook an Urban Structure and Characteristic Study (2009) which identified, analysed and characterised the spatial structure of the borough. It presented the '24 places' (see figure 7) and set out the historical and built processes that have come to form the townscape and identity of that place. The findings were used to inform the spatial vision as set out in the adopted Core Strategy and helped formulate the vision, area priorities and development principles as set out in chapter nine (Annex: Delivering placemaking).

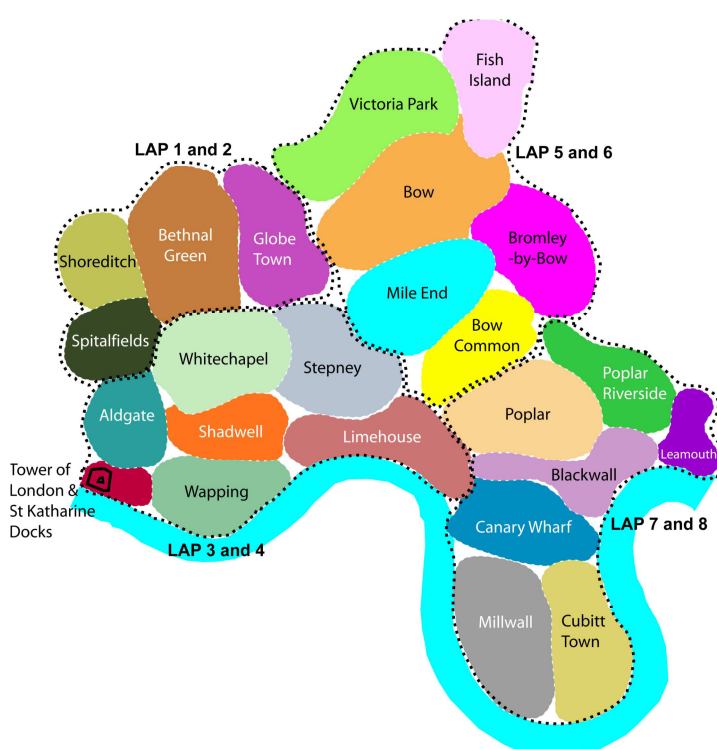


Figure 7 Tower Hamlets 24 Places (LBTH, 2010)

Unique townscapes, heritage and high quality design

The borough has 58 Conservation Areas, covering around 30% of the borough and varying enormously in their size and character. It also includes over 900 Listed Buildings, ranging from the medieval parish church of St Dunstan (which pre-dates the Tower of London) to the High Tech Former Financial Times Print Works (constructed in the late 1980s). Alongside these designated heritage assets, the townscape of the Borough features many high quality developments by internationally renowned architects and emerging design practices.

Tower Hamlets is now the second most densely populated borough in London, and the townscape of the borough is evolving with the increase in density. Many areas have undergone significant regeneration, with some buildings being replaced and others being restored, adapted and reused. There has been an increase in the number of tall buildings, particularly residential ones, causing notable changes to the borough's skyline. This process of change requires careful management to ensure meaningful design which is sensitive to the borough's unique townscapes.

Environment

Tower Hamlets' geography and urban form mean it is vulnerable to the effects of climate change, in particular from flooding and the urban heat island effect. The borough is also a contributor towards climate change, as it is the third highest emitter of CO₂ in London. Both National and Regional Governments have committed to both reducing CO₂ emissions and adapting to and mitigating the effects of Climate Change. The Local Plan provides an opportunity for Tower Hamlets to contribute towards this national and regional ambition.

While Tower Hamlets has a range of open spaces that contribute to the wider landscape character and biodiversity, the overall provision of publicly accessible open space in the borough is still low compared to some other London boroughs and national standards. Parts of Tower Hamlets, particularly around major roads, have some of the poorest air quality levels in London. Since 2000 the borough has been declared an Air Quality Management Area (AQMA) for both NO₂ (Nitrogen Dioxide) and PM10 (particulate matter). This means that the air quality in Tower Hamlets is constantly monitored to identify the levels of harmful pollutants, which have adverse effects on residents' health and well-being. Since monitoring began, Tower Hamlets continues to exceed Air Quality Objectives. The Local Plan provides an opportunity to build on the improvements made to local biodiversity, as well as to address current environmental issues, including climate change, poor air quality and the deficit of Open Space.

People

Population Growth

The borough's population has grown significantly since the 2010. Tower Hamlets has recorded the fastest growing population in the country in recent years, growing almost 30% between the 2001 and 2011 Census. The Census also shows that Tower Hamlets is the second most densely populated borough in London, with a daytime population that increases by about 60%, rising to 428,000.

Our Diverse Community

One of Tower Hamlets' defining characteristics is the diversity of people who live here. According to the 2011 Census, 69 per cent of the borough's population are from a minority ethnic community. In the last decade international migration has shaped the profile of the borough's communities. 43 per cent of the borough's population were born outside of the UK. The projection going forward to the new Local Plan period indicates that the proportion of Black and Minority Ethnic (BME) and white residents will change little to 2031.

Employment and Education

Tower Hamlets is the fourth largest employment location in London, however the majority of employment is undertaken by employees commuting from outside the borough (LBTH Employment Strategy, 2011). This is reflected in the estimated daytime population of 428,000 people, despite the resident population being 284,000 for the same period. Conversely, about a fifth of jobs in the borough are filled by residents. Around 20 per cent of all employment in the borough (about 48,000 jobs) are based in the 'low pay' sectors (BRS in LBTH, 2014).

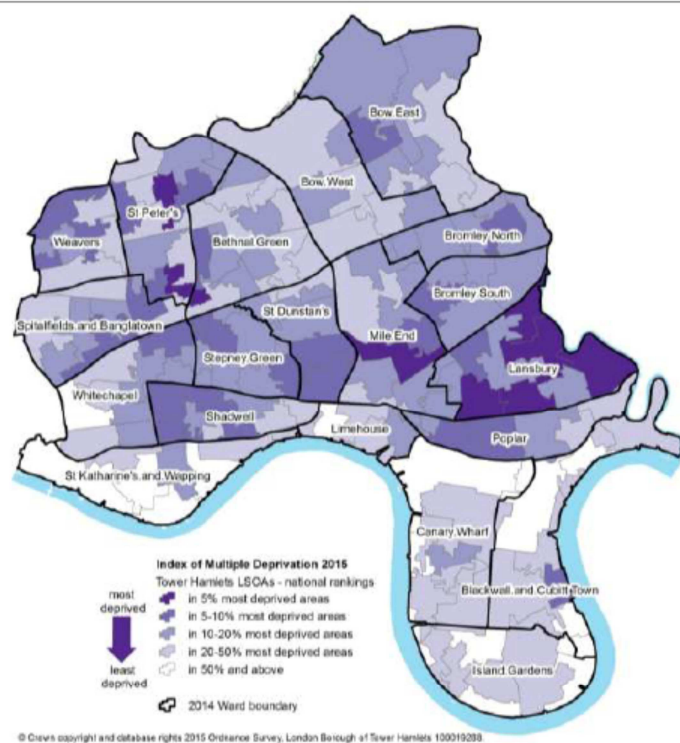
The proportion of economically active residents (67 per cent) is improving but lower than for London and Great Britain. Qualification levels of the resident population are changing positively. Residents with Level 4 and above qualifications nearly doubled from 41,500 in 2001 to around 82,000 in 2011 (LBTH, 2014) (see Figure 14 below). The Borough's education, training and skills programmes are considered essential to helping people into employment and able to access the many job opportunities available in the borough.

Inequality and Deprivation

The 2015 Indices of Deprivation (DCLG, 2015) show that while Tower Hamlets has become relatively less deprived than it has been according to the latest indices, deprivation remains widespread and the Borough also continues to have the highest rates of child and pensioner poverty in England (LBTH, 2016). Figure 12 below shows that four wards in the east of the borough are within the most

deprived 5 per cent of the wards in England. They are Lansbury, Bromley South, Mile End and Bromley North. However alongside this high level of deprivation, the borough also contains a number of wards which are within the least deprived in England. This disparity is reflected in the borough's pay ratio which is the largest, reflecting the greatest inequality in London (London Poverty Profile, 2015).

The borough also has significant health inequalities which result in a difference of 3.3 years between the most and least deprived females in the borough, and 6.9 years for males.



Source: DCLG, Indices of Deprivation 2015

Figure 12 Index of Multiple Deprivation 2015 (DCLG)

Planning for the future

Future Housing Need

The London Strategic Housing Market Assessment (SHMA) (GLA, 2013) indicates that London will require between 49,000 (2015-36) and 62,000 (2015-26) more homes a year. In particular, it highlighted an urgent need to address the housing shortfall over a relatively shorter period. Based on the last London wide Strategic Housing Land Availability Assessment (SHLAA) (2013), it identified that Tower Hamlets would have the capacity to allocate more housing, therefore the borough housing target has increased from 2,885 to 3,931 in 2015. The Council is now allocated the highest target with a requirement to deliver approximately 9%² of the total annual housing requirement set for London. Compared to the neighbouring boroughs, the borough housing target is about 3% higher than London Borough of Hackney (6%), 6% higher than LLDC (3%) and 4% higher than London Borough of Newham (5%). This is far greater than DCLG's household projections (2014) and the borough's objectively assessed housing need of 2,428³. However, given that London housing need is strategic, Tower Hamlets is required to not only meet its local need but also the London's strategic housing need. Thus, the new target would mean that Tower Hamlets will need to absorb approximately 9% of

² The London Plan (March 2015), table A4.1.

³ The London Borough of Tower Hamlets Strategic Housing Market Assessment (LBTH, 2014), figure 1.

Greater London's overall minimum housing target by 2025 within just 1.3% of the capital's geographical land area.

Although the Council has maintained a healthy supply of planning permissions for new homes over the years, the current London Plan ten-year minimum housing target of delivering 39,310 between 2015 and 2025 is ambitious and capacity-driven, and it will require house building to increase to a level not seen since the 1930s. In order to make sure the Council can fulfil its duty, it is clear that we must work collaboratively with the GLA and other London Boroughs if required, to establish a more realistic local picture of the deliverability of and ability to develop⁴ sites for housing. There is scope for the current capacity for housing in Tower Hamlets to be changed subject to the completion of the forthcoming Strategic Housing Land Availability Assessment (SHLAA) between December 2016 and April 2017, followed by a new London Strategic SHMA. It is expected that the revised housing evidence from the GLA will inform the Tower Hamlets housing targets from 2025 to 2031.

The Council's priority is to make sure that high quality housing is provided to meet the needs of the borough's existing and future residents. In particular, focusing on:

- Provision of infrastructure required to support the growth and development across the borough - this could include highways, bridges, decking, tunnels and river crossings, education, health, schools, leisure and community facilities, public realm, utilities, water, public transport; and
- Provision of high quality affordable housing which helps to meet the needs of people from a wide range of income levels – enabling the Council to optimise the delivery of the right type of affordable housing in the right location.

In order to achieve this, the Council will work in partnership with the key stakeholders including the government, GLA, TfL, infrastructure providers, developers and landowners etc. Strategic planning work has already taken place in the identified growth areas such as City Fringe/Whitechapel, Isle of Dogs and South Poplar and Lower Lea Valley.

Through developing a new holistic plan that the Council can fully embrace the opportunity to deliver sustainable development with tangible benefits to the community by maximising the growth of housing, while securing necessary and vital infrastructure delivery over the plan period.

Enabling Economic and Employment Growth

The borough's economy, in particular the economic activity concentrated in Canary Wharf and the City Fringe provides a significant proportion of London's economic growth. At a local level, SMEs also support the borough's local economy. Employment projections published by the GLA estimate the number of jobs in the borough will almost double, increasing by 125,000 to 2031⁵. Local evidence⁶ indicates that the demand for employment floorspace (including offices and industrial) are approximately 756,000 sqm and 274,000 sqm in respective.

Employment growth will be concentrated in specific areas of the borough, each of which is subject to individual drivers and trends. These are summarised below:

City Fringe

City Fringe area of Tower Hamlets, including Tech City, is becoming one of London's most significant areas for economic growth. Technology and creative industry or digital-media related companies have been clustered in the area around Old Street, Shoreditch and Commercial Street, which is now moving towards the third-largest technology start-up cluster in the world after San Francisco and New York City. The GLA has estimated a capacity of 70,000 new jobs in the whole City Fringe area (also including parts of LB Hackney and LB Islington) and has identified a medical research cluster at Whitechapel

⁴ The National Planning Policy Framework Footnotes 11 and 12 (DCLG, 2012)

⁵ GLA Employment Projections, 2016: <http://data.london.gov.uk/dataset/gla-employment-projections/resource/28282ee1-5555-4524-ab43-a5df725cac43>

⁶ Tower Hamlets Employment Land Review (Draft) (LBTH, 2016)

associated with the Queen Mary University London. Crossrail 1 stations at Whitechapel and Canary Wharf are the most important regeneration catalyst.

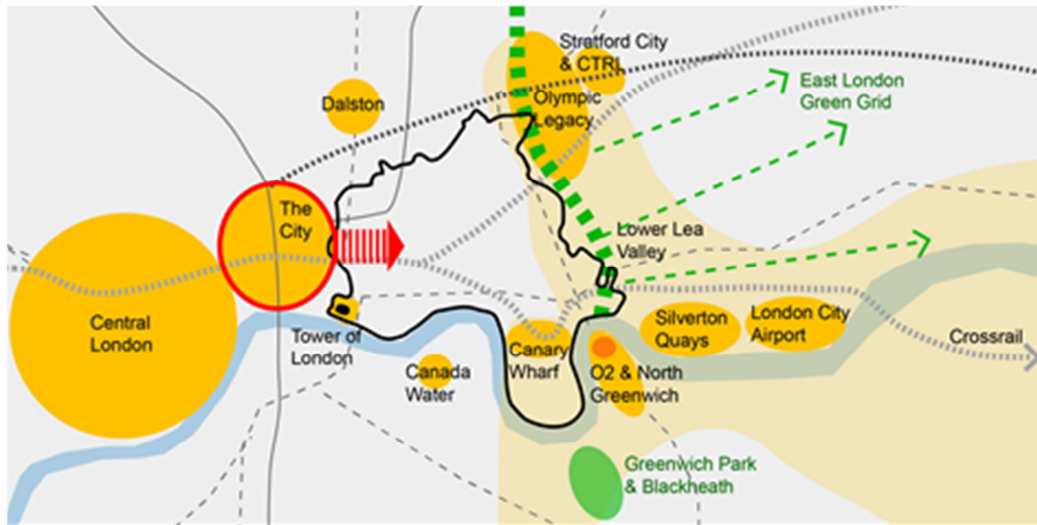


Figure 17 Expansion of the City into City Fringe – to be updated

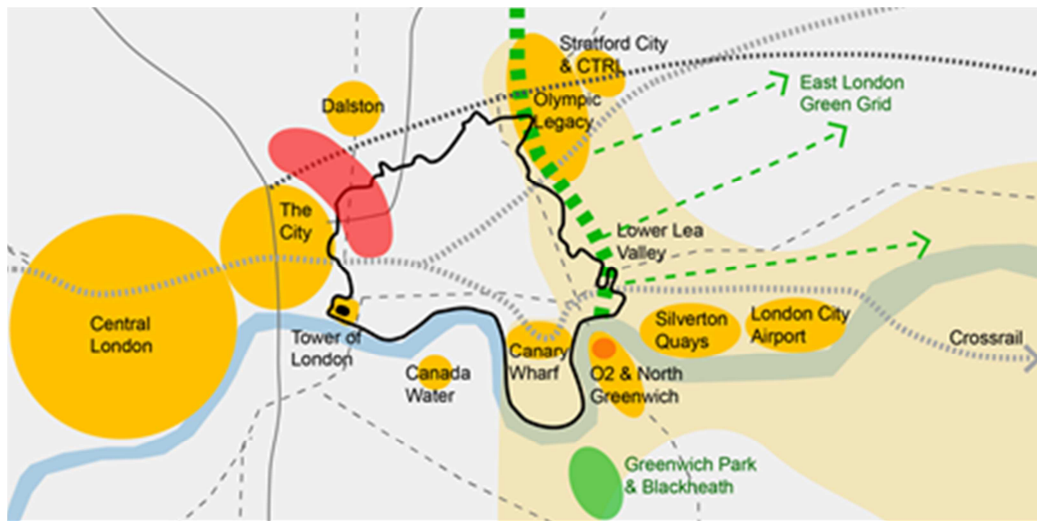


Figure 18 Expansion of supporting City uses into Shoreditch, Spitalfields, Aldgate and Whitechapel - to be updated

Isle of Dogs and South Poplar

The growth success of Canary Wharf is expanding to adjacent areas increasing demands for additional employment floorspace, including employment space suitable for SMEs. There are currently a number of businesses operating from premises in South Quay which complement and support those at Canary Wharf. There is also a retail offer in South Quay which predominantly supports the convenience needs of local people. The GLA has estimated an indicative employment capacity of 110,000 new jobs in this area. Again the Crossrail station at Canary Wharf is acting as a key catalyst enabling this growth.

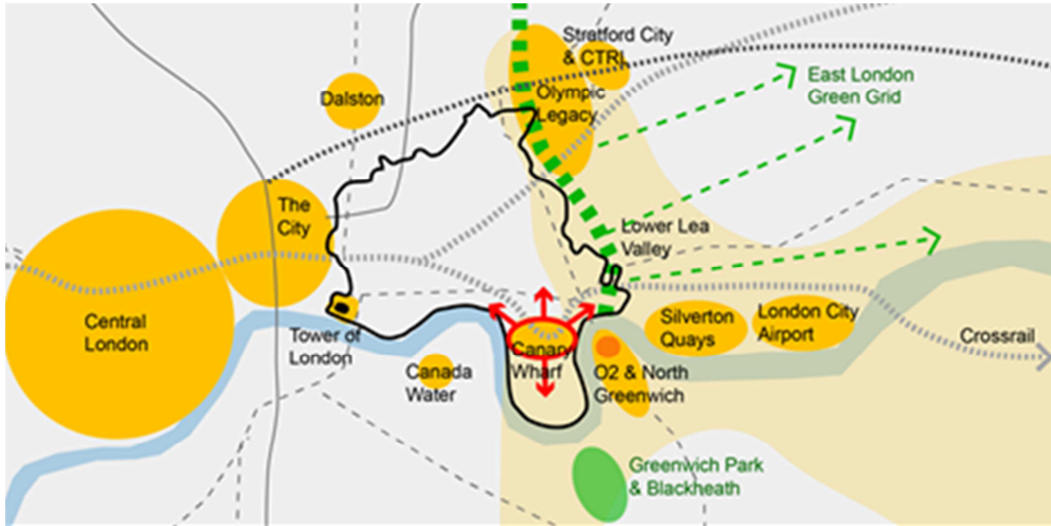


Figure 19 The spreading influence of Canary Wharf to the more immediate area ~~DELETE~~ – to be updated

Lower Lea Valley

The Olympic Legacy and resulting development in Stratford and Canning Town has been a catalyst attracting development opportunities and investment in this area. More recently, the designation of the Poplar Riverside Housing Zone is driving forward new proposals for redevelopment of former industrial land and the existing social housing estates. New development is bringing forward a number of SME employment spaces with a particular focus on creative industries. The borough's only Strategic Industrial Location and Local Industrial Locations are located in this area, ensuring the maintenance of key industrial uses. The GLA has estimated an indicative employment capacity of 50,000 new jobs in this area.

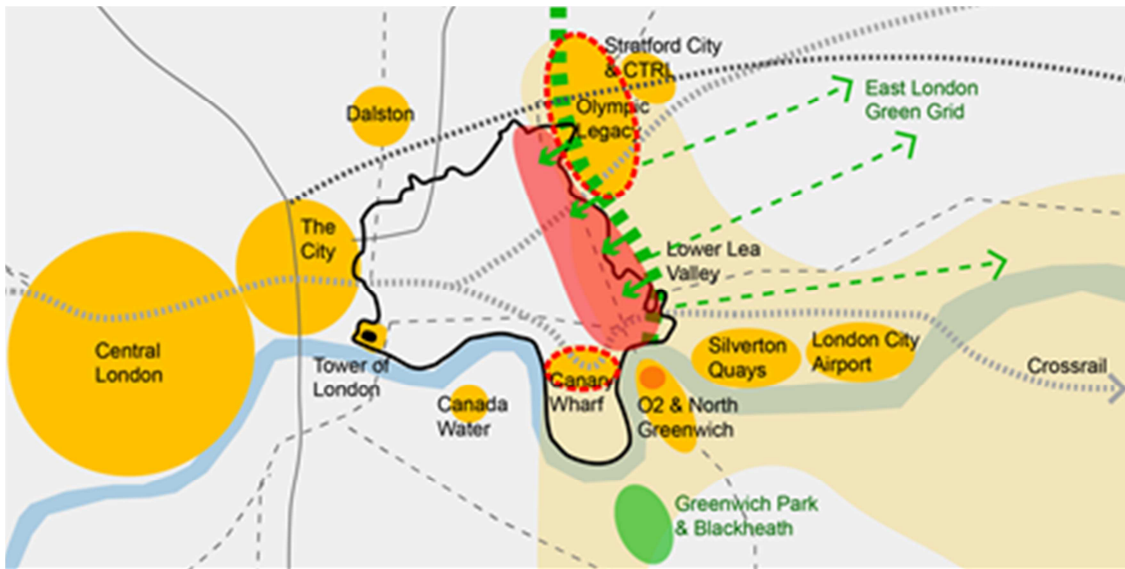


Figure 19 The spreading influence of the Olympic Legacy into the Lower Lea Valley ~~DELETE~~ – replace with single drawing

Town Centres

A balance of uses in town centres is vital to attracting investment, increasing visits and maintaining vitality and vibrancy. In accordance with the local evidence, it has suggested that the borough has the potential to deliver between approximately 9,000sqm and 17,000sqm of convenience retail floorspace across all town centres over the plan period.

A map of each town centres is included in appendix 7.

Supporting the Growth with Infrastructure

The boroughs future housing and economic growth potential cannot be achieved without significant investment provided by the Council and other service partners. It is important that the infrastructure is delivered in the right places at the right time to support growth and ensure the borough functions efficiently, providing opportunities for all. The following summarises the infrastructure need in the borough. A full list of projects which are planned to help meet this need are summarised in the Infrastructure Schedule in appendix 9.

Transport

Transport is a key infrastructure requirement for the borough to deliver the level of housing and employment growth currently required and projected.

By 2018 the borough will be served by Crossrail at Whitechapel and Canary Wharf. Crossrail will shorten journey times between these stations and a number of other major growth areas including Bond Street, Stratford City, City Airport, and Heathrow. This has significant implications for both national and international business, and will attract inward investment, more jobs, and development opportunities in the Whitechapel and Canary Wharf areas.

Given the projected number of people living, working and visiting the borough, a significant step change in transport capacity (in particular in relation to public transport, walking and cycling) is required. This needs to take the form of both infrastructure investment and enhanced service provision, but will also require wider operational strategies to promote and encourage sustainable travel.

Transport for London has a programme of measures for developing public transport provision across the borough, with the delivery of Crossrail the most prominent feature. Upgrades to the Central and Jubilee Lines are also scheduled, as well as opportunities to enhance the capacity of the DLR. Additional river crossings, including from Rotherhithe to Canary Wharf, North Greenwich to the Isle of Dogs and the Silvertown Tunnel are at different stages of consideration and development. While these measures will substantially increase capacity, the analysis has indicated a requirement for additional public transport capacity will outstrip this level of provision and so further measures will be required to support the projected growth⁷.

Without the investment and a step change in the boroughs transport infrastructure, it will not be possible to accommodate the significant levels of housing and economic growth set out in the Development Plan. To ensure that growth is matched with the necessary infrastructure, the Council will work in partnership with TfL and neighbouring boroughs to deliver the required investment, particularly in the borough's Opportunity Areas as identified in the London Plan (2015).

Education

To meet the needs of the growing population, the borough needs 7 forms of entry, which is equivalent to 3 to 4 primary schools and a further 8 forms of entry which is equivalent to 1 or 2 and secondary schools up to 2025. For primary schools, the borough's priority is to provide additional primary school places in areas of current and projected under supply, in order to enable pupils to attend schools in close proximity to home.

Health

To support the health and well-being of residents up to 38 additional GPs are required by 2030/31. The Council is working closely with the NHS to understand their requirements for the provision of these services.

⁷ Tower Hamlets Transport Strategy, 2016

Leisure

To support the health, wellbeing of local residents and providing spaces for socialising and community life, the following leisure facilities are required by 2030/31.

Using Sports England's calculations, technically, the borough requires up to 135 more badminton courts and a further 6 county size swimming pools. The benchmarks for performance used to produce the requirements are aspirational. The Council will help to meet this identified need through wherever possible extending existing and delivering new facilities, however the improvement of the quality and utilisation of existing facilities is an important consideration for the Council.

By 2030/31, between 2 and 4 additional facilities (or equivalent expansions to existing ones) should be delivered. The current Idea Store Strategy (2009) directs that Idea Stores and libraries have a catchment area of 1 mile. The Council should aim to ensure that as much of the borough is within the catchment of one of these facilities.

Open Space

There is a need for more open space in the borough to serve the growing population (a technical requirement of 2-3 additional open spaces the size of Victoria Park), but there is no land available to deliver a major new park. This will principally be met by identifying strategic sites to deliver publically accessible open space

CHAPTER 3: VISION, OBJECTIVES AND A SPATIAL STRATEGY

Introduction

At the heart of a Local Plan is the “Vision”; this is a strong, coherent, spatial and strategic statement that reflects aspirations of the local community for the future development of the borough over the next 15 years.

The vision establishes the priorities for the Local Plan and informs the objectives, strategic policies, development management policies and spatial strategy, which will help guide investment and planning decisions up to the year 2031.

The Proposed New Vision for Tower Hamlets

As the centre of London expands east, Tower Hamlets will embrace its role as the focus for London’s growth, making best use of the economic benefits from Canary Wharf, the City and Stratford. The connections between the borough and surrounding areas will be improved whilst maintaining our own distinct East-End identity. This growth will be primarily delivered in the Isle of Dogs and South Poplar, the Lower Lea Valley and the City Fringe and along transport corridors. The benefits of the transformation of our borough will be shared throughout Tower Hamlets and by 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 and cohesive neighbourhoods, which provide for a high quality of life. These will contain a wide range of housing types, prioritising family and affordable housing and be served by a range of excellent, shared and accessible services, community and recreation facilities and infrastructure. They will be green, safe and accessible to all, promoting walking and cycling and making best use of our network of parks and waterways, including Victoria and Mile End Park and the Thames and Lea rivers.

Places and neighbourhoods will be transformed with high quality buildings and well-designed spaces, while protecting what make each place unique: 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 mitigation to climate change. Innovative, 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 role of Canary Wharf and the City Fringe will be supported, alongside nurturing and developing our thriving SME sectors, properly recognising the need to support the entrepreneurial and business-focussed dynamism of many of our local residents, 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 by the enhancement of our public transport network.

In order to deliver this vision, the Local Plan has been shaped around two key objectives. Each objective is elaborated through principles and implementation.

- Key Objective 1: Managing growth and shaping change
- Key Objective 2: Spreading the Benefits of Growth

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 supported by social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported.***
- ***Growth must be balanced, containing employment, retail and community facilities, alongside increasing residential development***
- ***Growth must be well designed and enhance local distinctiveness, ensuring old and new are properly integrated***
- ***Growth must respect, protect and enhance our environment***
- ***Growth must make the best use of the best available technological innovations***

Implemented, through:

1. Delivering Tower Hamlets' regional role as a key location for London's housing and employment growth, while calling for adequate recognition of this role through regional and national investment prioritisation.
2. Positively meeting the duties to deliver our strategic housing based on a proper evidenced assessment of infrastructure capacity need for infrastructure investment and delivery.
3. While recognising that transport and community infrastructure is in various parts of the Borough reaching, at, or exceeding capacity, securing the timely provision of sufficient infrastructure to meet current and future requirements, with the cumulative impact of future development being considered.
4. Supporting additional transport infrastructure schemes, such as an Eastern Branch to Crossrail 2, enhanced river crossing capacity and strategic intervention and investment to support growth the Isle of Dogs.
5. Protecting a range of land uses, including a wide range of employment spaces, retail use 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, the delivery of pocket parks and ensuring connectivity between places.
7. Strengthening the role of our Town Centres to ensure all residents live within walking distance of a Town Centre which contains a diverse mix of uses, including a range of local services and shops.
8. Protecting the uses, spaces and places, including water spaces, which make the borough unique and delivering successful place making, which preserves heritage assets, enhances local distinctiveness, character and townscapes
9. Encouraging the use of innovative building types and technologies in suitable locations and where they provide sustainable high quality internal and external living environments.
10. 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
11. Recognising that while Tower Hamlets has some areas of tall buildings it is not by-and-large a high rise borough
12. Achieving a zero carbon borough in the 21st century, with a 60% reduction in carbon emissions by 2025.
13. Recognising that poor air quality is an urgent priority and must be addressed 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 help reduce social, economic and environmental inequalities, by enriching 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 health benefits and reduce health inequalities**

Implemented, through:

14. Reducing existing spatial inequalities and barriers and preventing the future polarisation of areas or communities, through maximising regeneration opportunities, in particular in South Poplar, the Lower Lea Valley and the Isle of Dogs.
15. Ensuring housing contributes to the creation of socially balanced and inclusive communities by offering housing choice reflecting the Council's priorities for genuinely affordable and family homes.
16. Helping to close the current skills gap, through improving access to education and training and increasing the mix of employment sectors.
17. Maximising the economic benefits from the borough's world class visitor attractions and encouraging visitors to explore more of the borough.
18. 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.
19. Delivering healthy neighbourhoods that promotes active and healthy lifestyles and recreation and enhances people's wider health and well-being.
20. Enabling all residents to be involved within the planning system, through consultation and by providing support for the process of Neighbourhood Planning.

A New Spatial Strategy for Tower Hamlets

In order to deliver the Vision and Objectives for the borough, the growth challenges and opportunities anticipated, the Draft Local Plan has identified four Sub Areas to provide more localised planning policy detail.

These proposed four sub-areas reflect the three existing regional spatial designations of the City Fringe Opportunity Area, the Lower Lea Valley Opportunity Area and Isle of Dogs & South Poplar Opportunity Area, where the greatest growth is expected, as well as providing a designation for the Central Area. The sub-area guidance continue to acknowledge and seek to protect and enhance the distinctiveness of the existing 24 character 'places' that make up each of the four sub-areas.

By reflecting the existing strategic designations, the Local Plan is able to have a greater influence over emerging regional plans for these key growth areas, as well as provide a greater level of detail to better shape and guide development in these areas. In addition, by planning for four larger areas, this new Spatial Strategy provides the opportunity to support strategic place making, reducing barriers between 'places' and addressing the edges of 'places' which may have previously been neglected. Together, the Strategic Areas and Character Places provide a spatial framework that will guide those involved in shaping and creating well-designed sustainable communities. In particular, they will be used as a placemaking tool in the development management process to ensure planning applications reinforce and contribute to the priorities and development principles of that area.

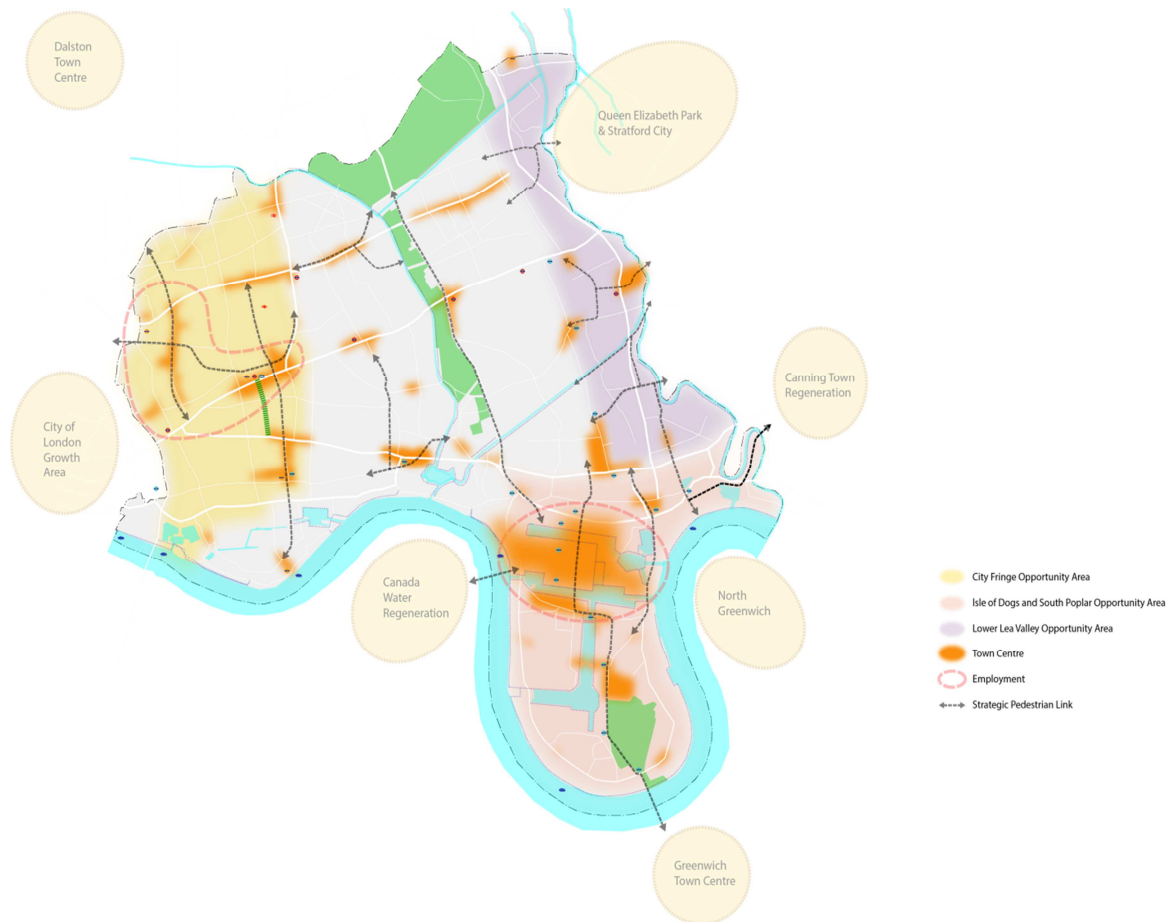


Figure 4 The Vision Key Diagram (Draft)

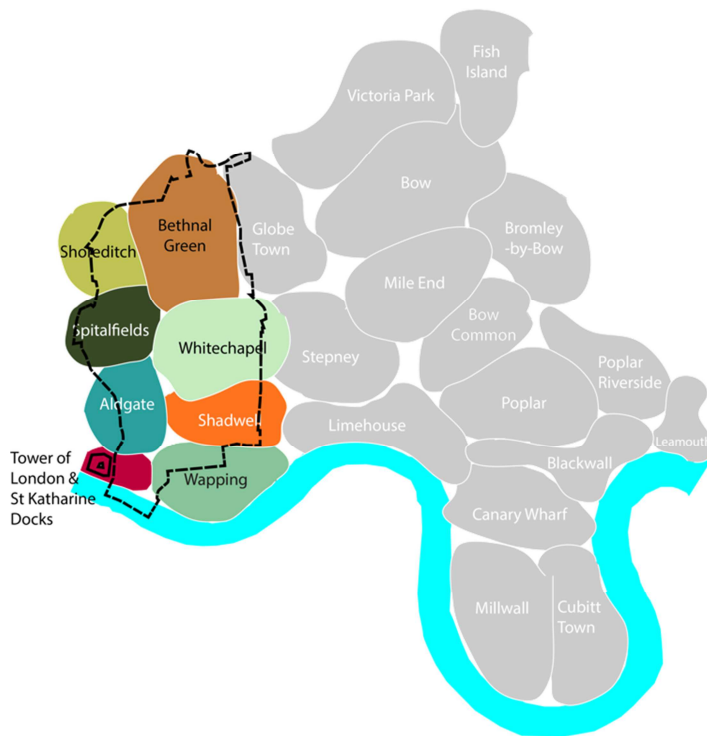
The vision and objectives and Spatial Strategy will be delivered through the Local Plan policies including the proposed Strategic Policies and the Development Management Policies set out in Chapter four and the proposed approach to placemaking in Chapter five.

The Four Sub-Areas:

The four Sub Areas each contribute towards delivering the new Local Plan’s vision and Objectives. Figures below illustrates the location of the area (underpinned by the ‘places’), followed by a brief description of the key trends for each of the Sub Area. An emerging vision, proposed area priorities and development principles are set out in Chapter five.

The boundaries of the areas are primarily defined by the boundaries of the opportunity areas as set out in the London Plan (2015) and its adopted Supplementary Planning Guidance. In some areas, minor adjustments to the boundaries are made, which extended and reduced in parts for simplicity and for the purpose of this document.

Sub Area 1: The City Fringe Opportunity Area:



To the west, the City Fringe the Opportunity Areas boundary has been extended in parts to run in follow the Boroughs boundary with the City of London and Hackney.

With the expansion of the City and the prosperity of Tech City, the City Fringe Opportunity Area has the potential to become a vibrant and exciting Tower Hamlets activity Area, with densely concentrated and mixed commercial, cultural, innovative, leisure and future administrative activities. It has the potential to compete with the West End with a proactive approach, which integrates potential town centre and housing regeneration or redevelopment with the expansion of the activity area.

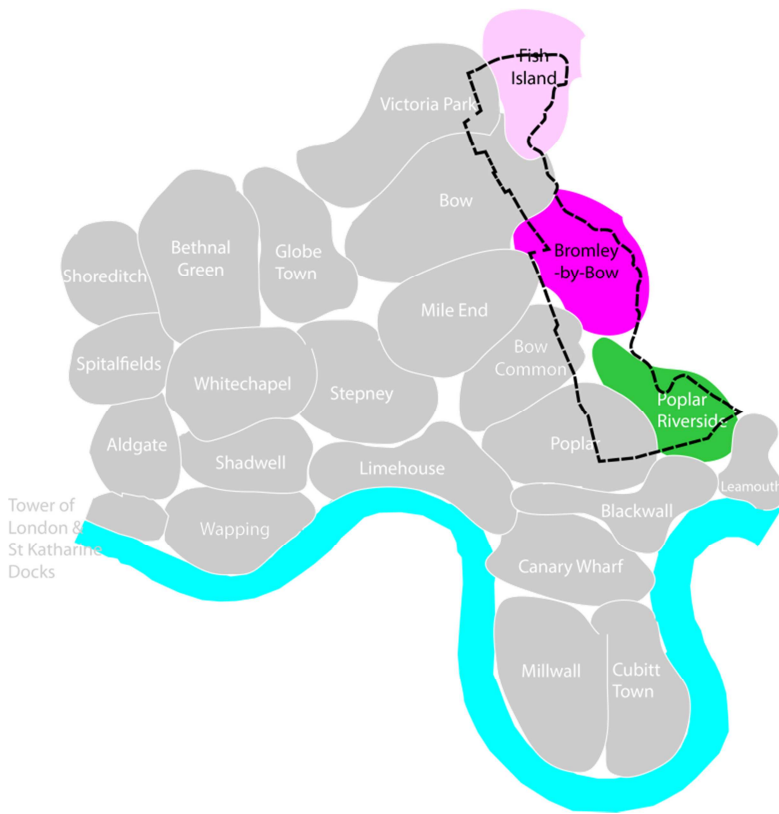
Sub Area 2: The Central Area



The Central Area boundary is defined mainly based on the area characterises, and the surrounded Opportunity Areas as set out in the London Plan and its Supplementary Planning Guidance.

The potential intensification of the existing town centres, the potential housing regeneration and the potential public realm improvement, will upgrade the social infrastructure, reduce the impact of through traffic severance and strengthen a coherent sense of community in these established neighbourhoods with rich green, blue and cultural infrastructure.

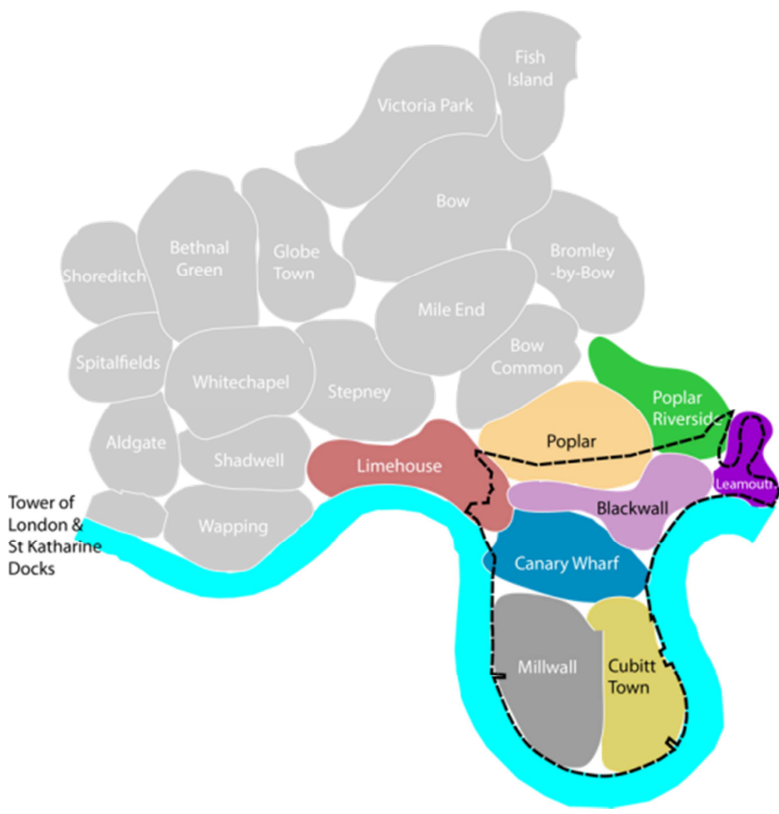
Sub Area 3: The Lower Lea Valley Area



To the east, the Lower Lea valley Opportunity Areas within Tower Hamlet has all been included. It should be noted that the eastern fringe of this area is in the LLDC area and therefore the policies relating to this sub-area cannot not applied, as this is beyond Tower Hamlets planning remit.

The Olympic legacy and the amenity value of Lower Lea Valley has brought rapid housing growth to the Lower Lea Valley Opportunity Area, The residential-led developments along the A12 started to stich up the severance on both sides of the A12. An integrated place-making strategy focused on the intensification of Bromley by Bow Town Centre, seamless spatial integration on both sides of the A12 and regeneration opportunities between the DLR and A12, will create attractive and appreciable riverside amenity and residential neighbourhoods and east access to social infrastructure and public transport / DLR stations.

Sub Area 4: The Isle of Dogs and South Poplar



To the south the Isle of Dogs and South Poplar Opportunity Area boundary has been used in full. In the south east corner there is an overlap between the Lower Lea Valley and Isle of Dogs and South Poplar boundaries. For the purposes of this plan, the section on the Isle of Dogs and South Poplar will contain the relevant information for those parts of Poplar, Blackwall and Leamouth.

The world class business cluster in Canary Wharf as Tower Hamlets Activity Area has brought development and growth to South Quay and other neighbouring areas. The integration of Canary Wharf and the neighbouring areas in South Poplar and isle of Dogs, which a much stronger land use and place-making strategy will establish the east London central business district as a more mixed, vibrant and resilient commercial hub which combines financial s, media, SME, innovative, retail and tourist industry. It will also support South poplar and the Isle of Dogs as an active and thriving community and a high quality residential destination.

CHAPTER 4: DRAFT POLICIES

Introduction

Chapters Four and Five contain the draft policies proposed for inclusion within the new Local Plan. The policies in the Draft Local Plan should not be considered individually but read as a whole. The policies should also be read alongside national planning policy guidance, the London Plan and supplementary guidance.

The policies include both Strategic Policies and Development Management Policies which are in themes as set out below:

- Sustainable Growth
- Design and Historic Environment
- Housing
- Employment
- Town Centres
- Community Facilities
- Open Space and Water Space
- Environmental Sustainability
- Transport, Connectivity and Construction
- Developer Contributions
- Delivering Place Making (contained in Chapter Five)

The Strategic Policies provide over-arching guidance for development across the borough. The Development Management Policies provide further detail on how development should be managed and implemented. The draft policies are supplemented by detailed guidance on Parking, Noise and Waste Standards set out in Appendix Two and Site Allocations within Appendix Three.

These policies have been published in draft and following public consultation may be amended to incorporate feedback received and in some cases may be further developed to make them more 'sound' in planning terms.

1. Sustainable Growth in Tower Hamlets

The following strategic policies set out a holistic approach to delivering sustainable development and growth in Tower Hamlets. It directly underpins the vision and the two key Strategic Objectives as set out in Chapter Three of this document: **Managing Growth and Shaping Change**; and **Spreading the Benefits of Growth**.

Strategic Policy SG1 Sustainable Growth in Tower Hamlets

Managing the Growth and Shaping Change

1. *Development will be supported where it is sustainable:*
 - a. *well designed;*
 - b. *maximises the potential of its site without over-developing it;*
 - b. *compliments the character and setting of the area;*
 - c. *does not result in unacceptable impacts on:*
 - i. *historic environment and its assets*
 - ii. *transport accessibility*
 - iii. *infrastructure*
 - iv. *any other site specific material considerations including amenity*
2. *Developments will be expected to contribute towards the provision of infrastructure, as identified in the Tower Hamlets' Infrastructure Delivery Plan. The infrastructure requirements resulting from a development should be mitigated on-site and through fulfilling the requirements of the adopted Planning Obligations SPD. Developments which rely on existing over-capacity off-site provision to meet any additional need will not be supported.*
3. *Developments will be expected to incorporate, sustainable design principles to reduce the development's carbon emissions and maximise climate change adaptation measures. Proposals should demonstrate through a supporting statement that sustainable design standards are integral to the design, construction and operation of the development. Proposals should also be accompanied by a pre-assessment, demonstrating how the following BREEAM standards (or any future replacement standards) will be met:*
 - a. *all new non-residential development and non-self-contained residential accommodation is expected to meet at least BREEAM 'Excellent' rating*
 - b. *all major non-residential refurbishment of existing buildings and conversions over 500sqm floorspace (gross) are expected to meet at least BREEAM non-domestic refurbishment 'Excellent' rating*
4. *Developments will employ good 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*
5. *Major developments and estate regeneration schemes will be expected to undertake thorough and inclusive public consultations, well in advance of submitting a planning application. This should be evidenced through a Consultation Statement.*

Sharing the benefits of growth

6. *Developments are required to contribute to creating healthy environments, including encouraging physical activity, promoting good mental and physical wellbeing and reducing environmental factors which can contribute to poor health.*
7. *The following developments will be expected to complete a Health Impact Assessment and submit it as part of their planning application:*
 - a. *major developments;*
 - b. *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. *Sui Generis betting shops*
 - vi. *publicly accessible open space; or*
 - vii. *is within an area of sub-standard air quality*

Developments will be required to contribute towards the delivery of the 'One Tower Hamlets' principles:

- a. *creating mixed and balanced communities;*
- b. *delivering tenure-blind developments;*
- c. *maximising the accessibility of community facilities and services ;*
- d. *incorporating inclusive design principles both within the new development and in how the development connects to its surroundings;*
- e. *increases opportunities for social interaction;*
- f. *providing local training or employment opportunities in either, or both, the construction and end use, and*
- g. *delivering infrastructure and public realm improvements which are accessible to all.*

Justification

This policy is derived from the cross cutting themes consulted on during the previous initial engagement stage. It is the key thrust of the new Local Plan and will need to be considered together with other policies within the document to ensure individual development proposals positively contribute to implementing and delivering the vision and objectives for Tower Hamlets.

The high level of growth taking place in the borough, much of which is taking place alongside, or within areas which are already densely inhabited, requires careful management to limit the impact on existing communities.

The emerging Infrastructure Delivery Plan highlights that the borough's existing infrastructure is either at, or reaching, full capacity. Development is therefore expected to contribute towards meeting the additional infrastructure needs their development will create.

Tower Hamlets emits far higher levels of carbon emissions than the London or National average. Embedding sustainable design principles at an early stage will ensure that all opportunities to reduce carbon emissions and adapt to the impact of climate change, are explored.

Tower Hamlets has high levels of poor health, which environmental improvements can help to tackle. The requirement for certain developments to undertake a Health Impact Assessment (HIA) is to enable them to consider the potential health impacts and maximise opportunities to improve health and mitigate any negative health impacts. The inclusion of an HIA policy is recommended in

accordance with London Plan Policy 3.2C. This approach limits the number of HIAs to developments where they would have most impact – ensuring they add value.

The design of the built environment and the provision of accessible services are able to directly contribute to reducing inequalities and promoting community cohesion. As highlighted by the Tower Hamlets Community Plan, 2015, the rapid pace of change occurring in the borough increases the risk that some groups of residents do not benefit from these changes, and the nature of the new development also means that new groups of residents will also be making the borough their home. These policies address this risk and help to ensure the continued delivery of One Tower Hamlets. Planning has a particular role to play in ensuring the built environment is accessible to those with physical impairments, addressed in SG1.8c.

Policy Implementation

In assessing SG1.1 the Council will consider the application and design in its entirety. In order to address SG1.2, developments will be required to demonstrate how they have met the infrastructure requirements through on site provision and/or through fulfilling the requirements of the adopted Planning Obligations SPD. Where existing infrastructure is expected to be used to fulfil need, evidence will be required that it has the capacity to meet the requirements resulting from the development.

To address SG1.3, developments will be expected to implement the minimum standards set out. BREEAM (Building Research Establishment Environmental Assessment Method) applies to non-residential developments and residential development arising from conversions and changes of use. This assessment method enables us to assess the environmental sustainability of a development. The Home Quality Mark, launched 2015, is one way of demonstrating the standard of a new residential dwelling, which includes measures for low CO₂, sustainable materials, good air quality and natural daylight. The Council will strongly encourage schemes to use the Home Quality Mark.

To address SG1.4, developments are encouraged to consider multifunctional climate change adaptations, such as green infrastructure which can deliver biodiversity, cooling and sustainable drainage benefits.

To address SG1.5, the Council's Statement of Community Involvement should be used as best practice guidance to inform the types of consultation methods to be utilised to inform the public of the development proposed. This should be done in advance of submitting a planning application.

To address SG1.7, a HIA should be undertaken in consultation with the Council's Public Health department. The existing best practice guidance should also be used, such as the HUDU Health Impact Assessment Matrix. Further guidance on the assessment of health impacts is published in Health Issues in Planning Best Practice Guidance, GLA 2007.

In order to address SG1.9, developments will be expected to provide a statement within the Policy Statement, identifying how they have addressed the principles of One Tower Hamlets, as outlined in policies SG1.9 a-g.

Strategic Policy SG2 Planning and Construction of New Development

1. *All applicants will be expected to sign up to the Considerate Constructors Scheme.*
2. *During construction, all development will be expected:*
 - a. *to comply with the Non Road Mobile Machinery Low Emission Zone;*
 - b. *not to create nuisance levels of noise, vibration, artificial light, odour, fumes or dust pollution and to follow the GLA's Control of Dust and Emissions Supplementary Planning Guidance (2014);*

- c. *to consider the routing, timing and frequency of HGV movements to reduce their impact on local amenity and congestion;*
 - d. *to seek to use, where available, Construction and/or Freight Consolidation Centres; and*
 - e. *to consider the impact of construction on the water supply, flood risk and drainage and implement suitable mitigation measures where required.*
3. Developments will be expected to consider the cumulative impact of development occurring in the vicinity on levels of noise, vibration, artificial light, odour, fumes or dust pollution, and plan timings of works, delivery timings and routes and location of equipment accordingly to reduce this cumulative impact.

Justification

Construction and deconstruction waste forms a significant proportion of waste generated in London. The process of limiting waste must begin early in site development and must include all those involved throughout the planning and construction of the development.

Policy Implementation

For further detail on implementing Part (2a) of this policy, see the GLA's Sustainable Design and Construction Supplementary Planning Guidance.

In order to demonstrate compliance with part (2c) of this policy, where appropriate, a Construction Logistics Plan should be submitted in line with guidance in the London Freight Plan.

In implementing Part (3) of this policy, development will also be required to minimise air pollution from any associated construction activities. Development should seek to adopt careful work practices aimed at minimising or preventing emissions. The use of water-borne transport will be expected where feasible, and the latest specifications of particulate filters and catalytic converters used on construction equipment and practices for preventing dust emissions. Cumulative Impacts arising from other building works within a 1km radius of the proposal site should be assessed and managed appropriately. This should be evidenced through the Construction (Environmental) Management Plan.

2. Design and Historic Environment

Introduction

Well-designed places are essential for the health and long term happiness of the borough's residents and help ensure that the benefits of developments are shared. The policies in this chapter will aim to contribute to this and to meet the Local Plan Vision and Objectives by including requirements to guide and manage new development in the borough.

The borough has a countless assets of historic, environmental and architectural value that makes it distinct and special. These assets can together bring improvements to people's quality of life and contribute to a sense of local identity and pride. It is important that future development respects these assets, and through good design, help to celebrate and enhance what we want to preserve in our neighbourhoods. It is also important that new development helps to create new assets and places that help support community cohesion.

It is important that all development in the Borough is well designed and helps to contribute to creating great places to live. Being well designed includes careful attention to the design concept and built fabric of the building, but more than this it means being in harmony with its surroundings and making a positive contribution to people's social, economic and environmental outlook. This means building sustainably robust places that mitigate the impacts of noise, air pollution and climate change and ensure developments integrate well to their surrounding areas making the most of opportunities to improve connections and permeability so that people access jobs, service, transport and our green grid. Importantly this also means respecting the defining aspects of the Borough's character.

Tower Hamlets is made up of a number of distinctive, diverse, historic and vibrant places whose characteristics together define the borough. These characteristic places have evolved gradually over the years. However, more recently the pace and scale of growth in London and the Borough is in danger of threatening the fabric of this unique and special places. As such, the new Local Plan provides an opportunity to review the effectiveness of the existing design and conservation policies to ensure that future growth is well managed and that the Borough continues to protect and enhance the Borough's historic environment and its assets and ensure that new development complements and enhances the Borough's distinctive place characteristics.

The design policies in this section should not be read alone but should be read alongside all relevant planning policies. In particular, there are a number of design policies related specifically to housing in the Housing section.

This section contains:

- Strategic Policy DH1 Good Design, Local Character
- Strategic Policy DH2 Attractive and Safe Streets, Spaces and Public Realm
- Strategic Policy DH3 The Historic Environment
- Policy DH4 World Heritage Sites
- Policy DH5 Building Heights
- Policy DH6 Density
- Policy DH7 Amenity
- Policy DH8 Noise Pollution
- Policy DH9 Overheating
- Policy DH10 Shopfronts
- Policy DH11 Advertisements and Hoardings
- Policy DH12 Telecommunications

Strategic Policy DH1 Good Design and Local Character and Historic Environment

1. *Developments will be required to be designed to the highest quality standards, incorporating principles of good design. This will be achieved by:*
 - a. *Protecting and enhancing amenity to promoting the mental and physical well-being of occupants/users of both the site and of neighbouring properties;*
 - b. *Positively contributing to the character of the borough's places by delivering the vision, priorities and principles for each place in line with policy SG1; and being sensitive to and responding to the existing character and reflecting this in:*
 - I. *scale, height, mass, bulk and form of development, and in particular*
 - II. *building plot sizes, plot coverage and street patterns;*
 - III. *building lines and setbacks, roof line and roof forms, streetscape rhythm and other streetscape elements;*
 - IV. *architectural language, design details, elements and materials applied on elevations, roof forms and landscapes (including boundary treatment),*
 - V. *enhancing the natural environment. protecting features of positive value within the site Retaining and respecting the features that contribute to each place's heritage, character and local distinctiveness;*
 - VI. *taking into account impacts on microclimate; and*
 - VII. *focusing tall buildings in identified Tall Building Zones.*
 - c. *Ensuring developments are supported by a range and mix of high-quality, publicly accessible green spaces that promote biodiversity, health and well-being;*
 - d. *Creating well connected and well integrated places;*
 - e. *Using high quality building materials and finishes to ensure the building is robust and fit for long term use;*
 - f. *Ensuring developments are designed to be easily adaptable to different uses and the changing needs of user;*
 - g. *Using design and construction techniques to reduce and mitigate the impact of noise, overheating and air pollution and optimising energy and waste efficiency in accordance with SG 1 and SG2; and*
 - h. *Reusing existing buildings where possible.*
2. *Development will be required to conserve and enhance the Borough historic environment and support the Council's positive strategy for the historic environment set out in the Conservation Strategy and supported by policy DH3.*

Justification

The Council considers that good design is indivisible from good planning. The purpose of this policy is to set out the key elements of good design that are further supplemented by the remaining policies in this section and in the Draft Local Plan. It aims to promote a borough with well-designed, high quality and sustainable buildings that enrich the local environment, respond and integrate in to the wider London area contributes to quality of life and deliver successful placemaking in Tower Hamlets.

Part (1) set out the basis for ensuring that good design principles are incorporated into individual development proposals so that we create buildings, spaces and places that are of high quality, sustainable, accessible, attractive, durable and well-integrated with their surrounds. It provides further details on key elements of good design that should be considered at all scales of development. Includes in this are references to the importance of the Borough's existing character and the identified places in the Borough.

Part (1a) recognises the importance of good design to the health and well-being of our Borough's residents. It is important that from the outset, new developments consider how their design and layout will maximise opportunities to improve the health and well-being of user and the wider community, wherever possible.

Part 1(e to f) addresses the Council's concern that many of the borough's the materials and the finish of many of our new buildings is not robust enough to accommodate wear and tear, particularly which is associated with family living and supporting the needs of our most vulnerable residents. It is therefore considered important that new developments are built as robustly and durably, as possible to support its users and to reduce the need for further alternations to make useable, where possible.

Part (1) (g to h) extends the detail contained in policy SG1 and SG2 regarding development construction and highlights the importance of integrated sustainable solutions to managing climate change and maximising opportunities for waste and energy efficiencies. Included in this is the preference for buildings to be retained and reused where possible to reduce the developments carbon footprint and meet our London Plan duty to reduce construction waste.

Part (2) along with policy DH3 and DH4 help fulfil the Council's duty as set out in the NPPF to conserve and enhance the Borough's historic environment. The Borough has a wealth of historic assets that should be conserved and enhanced as part of new development. The council considers this critical for the future of the Borough, particularly as pressure for new development in some parts threatens the integrity of these assets.

Policy Implementation

The character and places in the Borough are described in more detail in the Chapter 2 The Borough Context and in Chapter 5 The Borough's Sub-Areas and in the Tower Hamlets Urban Structure and Characterisation Study (2009) and its update (2016).

Part (1a), in line with Policy SG1 developments will need to be supported by a Health Impact Assessment to show how this policy requirement has been satisfied. To implement part (1) (e), development will need to provide detailed technical information regarding materials and finishes to demonstrate their longevity, quality and relationship to the local context, as part of the development management process.

Part (1) (g to h) should be read in line with Policy SG1 .4, which require good standards of sustainable construction to be employed.

Part (2) should be read in conjunction with Policy DH3 and DH4.

Strategic Policy DH2 Attractive and Safe Streets, Spaces and Public Realm

1. *Developments will 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. The street hierarchy consists of:*
 - a. *Main Streets – Focusing on movement, and prioritising the safe and convenient flow of buses and cyclists*
 - b. *Secondary Streets – Balancing a movement function, including vehicles, cyclists and pedestrians, with a place function, as attractive and convenient places to gather*
 - c. *Local Streets – Protecting and enhancing the place and social gathering function those local streets provide, alongside their function of providing safe and convenient access to individual properties*

2. *Developments will be required to protect, promote and ensure a well-connected, joined-up street network and the wider network of public spaces that is easily accessible for all people by taking steps to improve and enhance connectivity, permeability and legibility:*
 - a. *between Tower Hamlets and neighbouring boroughs;*
 - b. *as identified in the Local Plan's Spatial Vision, Sub-Area Vision, and site allocations; the Council's Cycling Strategy; Green Grid Study and in the principles of approved planning policy documents;*
 - c. *linking to public transport, town centres, open spaces and social and community facilities;*
 - d. *by providing public realm improvements in Transport Interchange Areas to ensure easy and pleasant interchange between different transport modes; and*
 - e. *maintaining existing public routes or appropriately re-providing them during the construction phases*

3. *Development will be required to positively contribute to the public realm by:*
 - a. *optimising active frontage towards all public streets and spaces;*
 - b. *providing clear definitions and enclosure of the public realm, through building frontage and massing, and connection and continuity of pedestrian desire lines and street activities;*
 - c. *ensuring development and the public realm are designed at a human scale;*
 - d. *creating a high-quality public realm which provides a range of sizes of public space that can function as places for social gathering;*
 - e. *ensuring design of the public realm is integral to development proposals and improves links and connections to the surrounding public realm;*
 - f. *reducing visual clutter and obstacles to in the public realm of the schemes and adjacent area;*
 - g. *resisting creation of gated communities;*
 - h. *sensitively integrating refuse and recycling facilities within the building envelope;*
 - i. *retaining existing mature trees wherever possible, regardless of protected status;*
 - j. *ensuring development and the public realm are attractive, comfortable and useable, using high quality paving slabs, bricks and pavers for footways, parking spaces and local streets;*
 - k. *ensuring that a suitable soft landscaping strategy is implemented, designed to soften the streetscape, and provide visual and environmental relief from hard landscaping, buildings and traffic; and*
 - l. *ensuring that shopfronts, advertising and hoarding and telecommunications being well-designed and integrating with their context.*

4. *Development will be required to improve safety and perception of safety to pedestrians and users without compromising good design by:*
 - a. *incorporating the principles of design that help reduce opportunities for criminal behaviour and contribute to a sense of security without being overbearing and intimidating to help 'Design Out Crime';*
 - b. *locating entrances in visible, safe and accessible locations;*
 - c. *creating opportunities for natural surveillance, particularly at ground level;*
 - d. *ensuring no adverse impact on the safety and capacity of the road network;*
 - e. *designing out concealment points and leftover spaces; and*
 - f. *creating clear sightlines and improving legibility and lighting of the surrounding area at all times of the day*

The Council aims to deliver a safe, attractive, accessible and well-designed network of streets and spaces that make it easy and enjoyable for people to move around on foot and bicycle and to create streets, spaces and places which promote social interaction and inclusion, and where people value, enjoy and feel safe and comfortable.

Part (1) of this policy aims to ensure the hierarchy and the functionality of proposed public spaces is well considered with movement, legibility, street blocks, streetscape and spatial nodes and that the proposed public spaces are well defined with their functionality, street interfaces, pedestrian and vehicle movement, continuity of activity, and adjacent land uses.

Part (2) seeks to secure good connectivity by improving permeability and legibility within the development and its surrounding areas (including in adjacent boroughs) for all users. Connectivity refers to the number of connections and their integration, layout and relationship to one another and the impact this has on getting from one point to another, while permeability refers to the variety of pleasant, convenient and safe routes through an area and the capacity of those routes to carry the movement of people and includes ensuring street furniture and structures support the permeability and accessibility of an area and to avoid visual clutter and barriers to pedestrian 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 'wayfinding'. Part (2e) during a development's construction is important that existing public routes through or adjacent to the sites are maintained or provided to allow continued access.

Part (3) places public realm as a central component to the design of a development to ensure it is well integrated with the surrounding areas. This will help to produce a coordinated public realm using complementary elements such as materials, finishes, furniture, landscaping, signage and lighting. To ensure that development and the public realm is at a human scale. This seeks to put people at the heart of the design process by recognising the importance of how people view and feel about their environment. Through part (3a and c) providing an appropriate sense of enclosure is a key element of delivering development and places at a human scale. It 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, through continuous building lines and active frontage. It generates natural surveillance which helps to ensure an area is well-used and safe.

Part (3)(f) aims to address visual clutter as well as physical obstacles to movement. As such the removal of unnecessary street furniture and guardrails or sensible assimilation of street furniture, lighting posts or traffic signs should be supported. Part (3)(g) recognises that development that unduly restricts public access and movement including gated communities, are not considered to contribute to a well-connected and permeable public realm. They may also have a negative impact on sustainable communities and social cohesion and have a negative effect on perceived safety and security. Part (3f) recognises the importance of ensuring the public realm is comfortable to use and functional to support the delivery of a successful and vibrant place. Part (3)(h) aims to ensure building frontages are active and to minimise visual and physical obstruction, spilling and odour issues from refuse and recycling facilities and to ensure facilities are safe, conveniently located and easily accessible by residents and operatives.

Part (4) seeks to embed the principles of Secured by Design that accord with the London Plan policies and the design policies in this Local Plan. Specifically it acknowledges the role that the built form including building lines and desire lines play in the legibility of an area. With regard to avoiding the creation of concealment points, external lighting should be an integral development component in ensuring safety and security of the public realm.

Policy Implementation

More detailed guidance is provided in the Council's Inclusive Design Guidance Notes. As part of the development management process, the Council will expect developments to demonstrate that this policy has been satisfied in the supporting Health Impact Assessment (Policy

SG1), where relevant in the Construction Management and Logistics Plan and Delivery and Servicing Plan supporting a transport Assessment (Policy TN2) Considerate Constructors Scheme (Policy TN6).

Part (2) may be supported by measures including clear signage, step-free access and defined routes in accordance with the Legible London approach.

Part (3a-c) includes designing out blank walls, fences, shutters and garage doors or entry points wherever possible and maximising windows to habitable rooms, shop fronts and front doors.

Part (3i) includes suitable semi-mature street trees wherever technically possible, public planting and private or semi-private front gardens and the provision of meaningful, interactive or useable public art or craft. This should be read in conjunction with policy ES3

Strategic Policy DH3 The Historic Environment

1. *Development will be required to conserve and enhance the Borough's heritage assets and their settings, this includes:*
 - *World Heritage Sites*
 - *Conservation Areas*
 - *London Squares*
 - *Historic Parks and Gardens*
 - *Archaeological Remains*
 - *Archaeological Priority Areas*
 - *Scheduled Ancient Monuments*
 - *Statutory Listed Buildings*
 - *Locally Listed Buildings*
 - *Local Landmarks*
 - *Strategic and Local Designated Views*

2. *Proposals for the alteration, extension, change of use, or development within a designated and non-designated heritage asset or asset of community value will only be permitted where:*
 - a. *they do not result in an adverse impact on the character, fabric or identity of the heritage asset or its setting;*
 - b. *they are appropriate in terms of design, scale, form, detailing and materials in its local context;*
 - c. *they enhance or better reveal the significance of assets or their settings;*
 - d. *opportunities to mitigate or adapt to climate change through the re-use or adaptation are maximised;*
 - e. *in the case of a change of use, a thorough assessment has been carried out of the practicability of retaining existing use and outlining the wider public benefits of the proposed use; and*
 - f. *they preserve views identified in the updated Character Appraisals and Management Guidelines and additional locally important views*

3. *Proposals for the demolition of a heritage asset will only be considered under exceptional circumstances where substantial public benefit outweighs the substantial harm of demolition. Where exceptional circumstances require demolition to be considered, applications will be assessed on:*
 - 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. *For proposed development that lies in or adjacent to Archaeological Priority Areas, the Council will require the proposal to include an Archaeological Evaluation Report and will require any nationally important remains to be preserved permanently in site, subject to consultation with English Heritage*

Justification

The supporting text to Policy DH1.3 explains the important role of the borough's historic environment in shaping the character and identity of the Borough. In addition the Council has duties under the Conservation Areas and Listed Building Act and the NPPF to conserve and enhance the Borough's historic environment.

The Council has a positive strategy to managing its duty to protect and enhance Tower Hamlets' heritage assets and historic environment to ensure that they can be appreciated and enjoyed more by both current and future generations.

The Council's positive strategy is set out in the Conservation Strategy 2012. This positive strategy primarily comprises the policies in the Local Plan, the approved Conservation Area Character Appraisals and Management Guidelines and other material considerations and a proactive strategy to reduce the number of identified assets on the Heritage at Risk registered, maintained by Historic England. This is supported by policies in the NPPF and Conservation Areas and Listed Building Act.

The Conservation Strategy is being reviewed and a Draft Conservation Strategy 2016 has been published alongside the Draft Local Plan, to ensure the Council's positive strategy is as effective as possible. It is anticipated that the new strategy will be approved by the Council by the summer of 2017.

The Draft Conservation Strategy and emerging tall buildings evidence base consider views and important part of the character and historic environment of the borough. For the purposes of the Local Plan, these are defined as follows:

- a. Local Designated View

The local designated view consists of Viewing Location(s), Protected Vista and Strategically Important Landmark or Strategically Important Skyline or Local Designated Landmark which can be associated with specific Backdrop. Local Designated Views positively contribute to the identity and local distinctiveness of Places in Tower Hamlets.

There are the following different types of local views:

- Linear View - A view in which key landmarks are seen through narrow gaps between buildings or landscaping.
- Townscape View - Designated views which focus on architecturally and culturally important groups of buildings that can be enjoyed from well managed public spaces.
- Panorama - Wide view in which substantial parts of the London Borough of Tower Hamlets are seen, including multiple designated landmarks or skyline
- River Prospect - Short and longer distance visual experiences of the Thames riverscape.

- b. Focus of the view (what we look at, what we see)

- Strategically Important Landmark - A prominent building or structure in the townscape, which has visual prominence, provides a geographical or cultural orientation point and is aesthetically attractive through visibility from a wider area or through contrast with objects or buildings close by. The Strategically Important Landmarks in Tower Hamlets are the Tower of London and 1 Canada Square.
- Local Designated Landmark- Buildings and structures that are visually or culturally prominent in Designated Views, easily recognisable from a distance and positively contribute to the identity and local distinctiveness of Places in Tower Hamlets.
- Backdrop - The backdrop is the background to a Strategically Important Landmark or Local Designated Landmark. It is distinct from a background area that extends away from the foreground or middle ground into the distance. Backdrop and Landmark form

- a distinct composition which as a whole positively contributes to the identity and local distinctiveness of Places in Tower Hamlets.
 - Strategically Important Skyline - Substantial grouping of prominent buildings forming a consistent silhouette in London's strategic views and in multiple Local Designated Views.
- c. Viewing Plane (area between the place we look from and the objects we look at)
 - Protected Vista - A geometrically defined corridor between an Assessment Point and a Strategically Important Landmark. The Protected Vista controls the effect of development in the foreground, middle ground and background of a view of a Strategically Important Landmark.
- d. Viewing Place (where we look from)
 - Viewing Location - The general part of a Viewing Place from which a particular view may best be appreciated. There may be one or more Viewing Locations in each Viewing Place.
 - Viewing Place - A public space from which Designated Views are defined by the London Plan. Within each Viewing Place, one or more Viewing Locations can be defined.

Policy Implementation

Part (1) identifies the Borough's Heritage Assets. The significance of the heritage asset is described in more detail in the Conservation Strategy, the NPPF and the Conservation Areas and Listed Building Act.

Parts (1-4), as part of the development management process, developments will be required to demonstrate an understanding of the significance of the relevant asset or its setting. As a minimum this should be through reference to the Greater London Historic Environment Record (HER) or by a desk top analysis and reference to other documentation. Any other research undertaken of 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. Detailed plans will be required to be submitted with applications as part of Design and Access and Heritage Statements, demonstrating how the heritage assets will be protected or enhanced, to enable the Council to assess the effect of the proposed development on the heritage asset. Decisions will be based on the nature, extent and level of significant impact to the heritage asset.

Where, as a result of implementing a consent, a new heritage asset is discovered, or the significance of an existing asset is increased in a way that could not reasonably have been foreseen at the application stage, the developer will be expected to work with the Council to seek a solution that protects the significance of the new discovery, so far as is practical, within the existing scheme. Depending on the importance of the discovery, modifications to the scheme being implemented may be required.

Parts (1-4), the Council will use the relevant Conservation Area Character Appraisals and Management Guidelines as the basis to assess any application within a Conservation Area or its setting. Not all elements of a Conservation Area will necessarily contribute to its significance. When considering proposals the Council will take into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.

Parts (1-4) the Draft Policies Map identifies Conservation Areas and Archaeological Priority Areas. For the most up-to-date information interested parties should refer to the Council's website.

Parts (1-4) The Council encourages development and inclusive design solutions that enable disabled people to access the historic environment. The Equalities Act 2010 seeks to address the discrimination that many disabled people face. All service providers, including owners and tenants of Listed Buildings and scheduled monuments open to the public, churches and employers, are required to provide information and assistance for disabled persons. These service providers are also required to carry

out 'reasonable adjustments' to physical features of their buildings to enable access for disabled people.

Parts (1-4), the Council maintains the 'Heritage at Risk Register', which is managed by Historic England, and monitors the condition of heritage assets where possible. If deemed appropriate, the Council will exercise its legal powers to ensure that essential maintenance of designated heritage assets is undertaken. The Council will seek to work with partners to secure creative solutions that would contribute positively to local character and vitality

Part (3), in applying this policy consideration will be given to the significance of the heritage asset and whether a viable use can be found. For example, the demolition of a heritage asset would only be considered acceptable in exceptional circumstances whereas there are instances where the loss of a building within a conservation area may be considered acceptable when the public benefits of the scheme are considered. An appropriate heritage statement will be required to demonstrate which viable use can be found in the medium term in proportion to the significance of the asset.

In addition, it should be noted that that in addition to planning permission for development, Listed Building Consent will also be required for works that will affect the special character of a Listed Building.

Policy DH4 World Heritage Sites

- 1. Development will need to ensure it does not negatively affect the UNESCO World Heritage Site status of the Tower of London or Maritime Greenwich.*
- 2. Development must be tested for its impact on the sites' Outstanding Universal Value (OUV) ensuring that the proposal sustains and enhances the OUV of the World Heritage Sites. This also applies to development that would affect the setting of the Tower or Maritime Greenwich, particularly in the environs of Tower Hill and the Isle of Dogs, or would impinge upon strategic or other significant views to or from the sites.*
- 3. Development proposals within the vicinity of the Tower of London will be expected to positively contribute to improvements to movement and connection, particularly for pedestrians and cyclist and the public realm*

Justification

) World Heritage Sites are both natural features and manmade structures that have been listed by United Nations Education, Scientific and Cultural Organisation (UNESCO as of special cultural or physical significance.

London Borough of Tower Hamlets includes the Tower of London World Heritage Site and forms a boundary to the south with Greenwich World Heritage Site. The Council has a duty to conserve and enhance these heritage assets.

The Tower of London World Heritage Site is one of the Borough's most important landmarks, indeed it contributes to the name London Borough of Tower Hamlets. This is one of London's most popular visitor attractions and the first time many visitors experience the Borough. However, many of the streets and spaces in and around this important heritage asset are dominated by vehicles and the highway and offer a poor public realm and environmental experience. The Tower of London World Heritage Site Management Plan also identifies this issue. The purpose of this policy part is to positively address this issue.

Policy Implementation

DH1 and DH3 sets out the Council's overarching approach to protecting, managing and enhancing heritage assets including World Heritage Sites (WHS). This policy provides additional detail to ensure development proposals enhance the World Heritage Sites, their settings and views to and from them.

Part (3), developers in close proximity to the Tower of London or those that are likely to impact on the setting and views of the Tower or Maritime Greenwich need to ensure they comply with all guidance prepared to manage the impacts of developments in and around World Heritage Sites, including the Tower of London World Heritage Site Management Plan (2016) and demonstrate that this has been satisfied as part of the development management process.

Policy DH5 Building Heights

1. *Proposals for tall buildings will be required to satisfy the criteria listed below:*
 - a. *Tall Buildings are only acceptable within identified Tall Building Zones.*
 - b. *Height and surroundings:*
 - i. *Be of a height and scale, mass and volume that are proportionate to its location and in keeping with the positive character of the local context of its surroundings, including the predominant building heights;*
 - ii. *Integrate with and not adversely impact on the skyline, when perceived from all angles during both the day and night and assist in consolidation of tall buildings clusters identified in the Town Centre hierarchy;*
 - iii. *Not harm heritage assets or strategic and local views, including their settings and backdrops;*
 - iv. *Are required to step down in a linear fashion towards the edge of the specified area.; and*
 - v. *Should not prejudice future development potential of neighbouring sites.*
 - c. *Design and use:*
 - i. *Each side of a tall building above the height of adjacent attached buildings will be treated as facing main facade of equal importance and not prejudice development on adjacent sites;*
 - ii. *Tall buildings will provide a sensitive transformation from the taller section to the lower volume along the street, ensuring a human scale street level experience;*
 - iii. *Present a human scale of development at the street level by appropriately designed massing, high quality details and materials;*
 - iv. *Where residential uses are proposed, include high quality and useable private and communal amenity space, which is easy to access and legible; and*
 - v. *To demonstrate how the design respects the character of its context including its scale, form, massing, footprint, proportion and silhouette, facing materials, relationship to other buildings and structures, the street network, public and private open spaces, watercourses and water bodies, or other townscape elements*
 - d. *Environment:*
 - i. *Achieve high architectural quality and use materials that are sustainable and durable;*
 - ii. *Demonstrate that relevant wind, daylight and sunlight assessments have identified impacts and that these have been successfully mitigated; Demonstrate that development does not adversely impact on the microclimate of the surrounding area, including the proposal site and public spaces;*
 - iii. *Demonstrate that development does not adversely impact on biodiversity or open spaces, including watercourses and water bodies and their hydrology, as*

well as their settings and views to and from them; Developments will provide wind conditions suitable for the intended use at that location. Developments which generate adverse wind conditions that cannot be mitigated will be resisted; and

- iv. Where roof terraces are proposed as communal open space or play space, appropriate mitigation measures against high winds will be applied to ensure they are useable.*

Justification

Parts (1)(a to d), a Tall Building is any building that is significantly taller than its surroundings and/or has a significant impact on the skyline. This is defined in the London Plan as being 10 storeys or up to 30 metres. A tall building is also defined by its relationship with its neighbouring buildings, for example it can be two storeys or taller than neighbouring buildings and/or the predominant building heights in the area.

The Council acknowledges the role that tall buildings can play in delivering much needed homes and jobs to the Borough. Tall buildings are likely to have greater impacts on their surroundings than other building types, due to impacts such as their significant visual impact, their impacts on the transport network, microclimate and surrounding occupants' access to daylight and sunlight.

The character of London Borough of Tower Hamlets is not of a tall buildings Borough, but as one that is relatively low rise as associated with the character of our historic places or hamlets. The Council considers it critical that the character of the Borough is respected, protected and enhanced. The Council is concerned that increasingly developments have come forward in the Borough for tall buildings that do not respect their context and have a negative effect on character.

In order to manage this and guide development, the Council has introduced Tall Buildings Zones to make it clear where it considers tall buildings appropriate and where they are considered inappropriate.

Buildings can affect the flow of air and cause wind tunnels. These effects have the potential to seriously impact amenity in the building and the surrounding area and need to be managed.

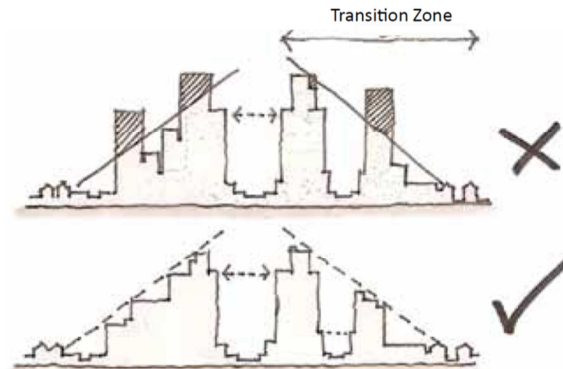
Policy Implementation

Parts (1)(a to d) tall Building Zones (TBZ) are identified in the Council's Tall Building Strategy (2016) and are primarily concentrated in areas in the City Fringe CAZ and in Canary Wharf Mayor Centre and Activity Area.

Part (b)(iii) should be read in conjunction with those set out in London Plan Policy 7.7, the London View Management Framework and designated landmarks and local views, including their settings and backdrops. They provide additional detail which is important for Tower Hamlets' local context.

Under part (b) Tall Buildings are required to step down towards the edge of the Tall Building Zones (TBZ) and surrounding lower buildings in order to create a sensitive transition between proposed tall buildings and surrounding existing low-rise development. As the boundaries of the TBZs generally correspond with existing streets, buildings on the edge of the TBZ will not be more than two storeys higher than average building height across the street (if representative of the predominant building heights). Further away from the edges, buildings will only go up 1 meter in height for every 2 meters distance (from the buildings within the edge of the TBZ). For example: Buildings just outside the TBZ, on the opposite side of the street, are on average 3 stories (in a street with predominantly 2-4 storey buildings). Then new buildings just within the TBZ boundary could be acceptable up to 5 storeys at that location. A building behind this, an estimated 20 meters away from (potential) 5 storey buildings on the edge, could then be 10 meters higher, so 8 storeys. Stepping up in height may continue until the maximum specified height of the TBZ has been reached, or until higher buildings would break the

stepping down (or up) rules when measured from another boundary of the TBZ. The height of existing Tall Buildings should not be used, although they have been taken into account when deciding the maximum height of the TBZ. Figure XX illustrates the principle of stepping down, or up, as driven by the height of the surrounding buildings, rather than by that of existing buildings. The buildings shown on the top illustration with hatched areas should only occur in the TBZ where these are existing Tall Buildings.



© City of Capetown - Draft Urban Design Guidelines for Tall Buildings (2012)

Figure XX - Stepping down principle

Parts (b-d), in order to enable assessment against the criteria the Council will require an Accurate Visual Representation to be submitted, in addition to a Design and Access Statement. This should show the proposal in near, middle and distant views, including the public realm and its appearance at street level. This 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 to be submitted depending on the scale of the proposal.

Part (di-vi), the wind assessment must consider the effects on the proposed development, including opens space, balconies, terraces, as well as the surrounding area. As part of the development management process, developments will need to demonstrate that they have tested and mitigated impacts. The testing will be required for all developments over 30m in height and/or substantially taller than the surrounding area and/or over 150 units, with regard to the industry standard Lawson criteria. The test results must be submitted with the planning application. The testing of the following scenarios will be required:

- baseline (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; and
- the development with surrounding cumulative developments with the inclusion of mitigation/landscaping.

Specific details on the required mitigation measures must be provided, including where and how the mitigation 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.

In addition, it should be noted that this policy also applies to proposals for tall buildings where existing tall building are located, including those outside the TBZ. The presence of an existing tall building on the site will not in itself be regarded by the Council as justification for replacement with another tall building or the commencement of a building cluster.

Policy DH6 Density

1. *Where densities in excess of the GLA's recommended residential density range are proposed development must:*
 - a. *Seek to positively exceed minimum design standards of the Local Plan and London Plan, where relevant; and,*
 - b. *demonstrate how the development contributes to positive placemaking,*
 - c. *demonstrate how the cumulative impacts of the proposed and approved development has been considered and addressed*

Justification

As such, density and the mitigation of its impact shall be used to determine the suitability of proposed buildings.

Part (1)(a) The Council is aware that many developments proposed seek to exceed the highest density level set out in the London Plan's optimum density range. While in principle, this is allowed as an expectation as part of the London Plan's policies, the Council is concerned that in some parts of the Borough these exceptional densities are coming forward in great numbers and in concentrated areas, this includes South Quay and parts of the City Fringe CAZ. Exceptional densities in these areas should not be the norm but should remain expectations. In order to achieve this, the Council requires that developments in excess of the London Plan density range should seek to exceed the minimum standards set out in the Local plan, London Plan and other relevant material consideration.

Part (1)(b) The Council is concerned that cumulative impact of these high density buildings on the character, infrastructure and living environment of the associated areas has not been proactively planned or coordinated, to clearly identify what the character, quality and impacts of all the resulting exceptions creates.

Policy Implementation

Parts (1a-b), the optimum residential density ranges can be found in table 3.2 in policy 3.4 of the London Plan (2015). Where residential density guidelines are applied to mixed-use developments, the relevant densities shall be the net residential density. Developers are expected to include in their planning application the relevant optimum density range for their site and the actual net residential density proposed, along with an assessment of the infrastructure capacity and proposed mitigation measures. Tall and dense developments are required to provide accessible and useable new public open space, including pocket parks, for use by residents and users of the surrounding areas, in line with the Council's policies.

Policy DH7 Amenity

1. *Developments are required to protect, enhance and where possible increase the extent of the amenity of new and existing surrounding residents and building occupants, as well as the amenity of the surrounding public realm, by:*
 - a. *maintaining good levels of privacy and avoiding an unreasonable level of overlooking or unacceptable increase in the sense of enclosure;*
 - b. *ensuring new and existing habitable rooms have an acceptable outlook;*
 - c. *ensuring adequate levels of daylight and sunlight for new residential developments, including amenity spaces within the development;*
 - d. *not resulting in an unacceptable material deterioration of the sunlighting and daylighting conditions of surrounding development including habitable rooms of residential*

- dwelling and schools and not result in an unacceptable level of overshadowing to surrounding open space and private outdoor space;*
- e. not creating unacceptable levels of noise, vibration, artificial light, odour, fume or dust pollution during the construction and life of the development; and*
 - f. creating, wherever possible, new attractive and usable open space that is accessible to all, visible and easy to access from the surrounding public realm and clearly public*

Justification

Policy DH1 explains that in order to be well designed, developments need to appropriately considered and address amenity. This includes considerations of privacy, overlooking, daylight and sunlight, including shadowing and other impacts including odour, fumes and dust as detailed in Parts (1)(a to f) of this policy.

Policy Implementation

Parts (1)(a to f) 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, study's, 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 fully considered as part of the assessment of amenity impacts.

Part (1)(a) requires new developments to be designed to ensure that there is sufficient privacy and that they do not enable an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto 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 concerned.

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. In applying part (1)(b), the Council will expect careful consideration of the layout and massing of buildings in order to ensure they do 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.

In applying parts (1)(c to d) of the policy, the Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development (including on amenity space and public open space). The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight.

A sunlight and daylight assessment will be required for all major planning applications and/or smaller schemes where adverse effects on daylight and sunlight levels are anticipated, following the methodology set out in the most recent version of Building Research Establishment's (BRE) "Site layout planning for daylight and sunlight: A guide to good practice" and British Standard 8206:2008, the results of which must be submitted with the planning application.

The methods relevant in this assessment of daylight are the Vertical Sky Component (VSC) method, the No Sky Line (NSL) method and Average Daylight Factor (ADF), and for sunlight the Annual Probable Sunlight Hours (APSH). Permanent and transient overshadowing caused by the new development should also be modelled. The assessment of light pollution should also be undertaken in accordance with The Institution of Lighting Professionals document titled Guidance Notes for the Reduction of Obstructive Light.

The assessment must also take into consideration the effects from, on and with cumulative developments. The study shall be in accordance with current guidelines.

Daylight and Sunlight assessments should also include consideration of the potential redevelopment of adjacent sites, so as not to prejudice their redevelopment.

In addition, the Council will take account of the sense of enclosure created by the new development. It is important that layout and massing are considered carefully in order to ensure that they do not create an oppressive sense of enclosure for adjoining development, including future development.

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. In applying part (1)(e) of this policy the Council will seek to limit the impact of artificial lighting by ensuring well-designed artificial lighting and appropriate light levels, reflecting the street hierarchy. Badly designed lighting schemes can be damaging to the environment and result in visual nuisance to residents.

Odour and fumes from commercial development can have an adverse impact on the amenity of surrounding residents. In particular the siting of flues needs to consider the impact on amenity and design. Best practice guidance should be followed; applicants should refer to the most recent version of the DEFRA Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems.

Dust pollution can often be a particular problem during the construction phase of the development. The Council will use conditions to secure Construction Management Plans where necessary and dust pollution should be actively managed along with the impacts on highways.

Policy DH8 Noise Pollution

- 1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. Identified impacts should be mitigated through design. The layout, orientation, design and use of buildings will ensure that operational noise does not adversely affect occupants or neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.*
- 2. Where new noise-sensitive land uses such as housing, hospitals and schools are proposed in proximity to existing noise-generating cultural and entertainment venues (such as cinemas, concert halls, live music venues, public houses and theatres), applications must robustly demonstrate how conflict with existing uses will be avoided, through mitigation measures.*
- 3. Developers will be required to demonstrate that the level of noise emitted from any new plant will be below the background level by at least 10dBA*

Justification

Parts (1-3), noise and vibration can have a major effect on amenity. The World Health Organisation (WHO) for example states that excessive noise can seriously harm human health, disturb sleep and have cardiovascular and behavioural effects. The increasingly high density and mixed use nature of developed in Tower Hamlets means that it is increasingly important that building design and use minimises noise pollution and disturbance.

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 on the long-term future of London's creative and cultural sector which has an impact not just on residents but also its tourism potential. In response, the Mayor of London has set up a 'London Night Time Commission' and a 'London Music Board'. The latter produced a 'London's Grassroots Music Venues Rescue Plan' in October 2015. This contained recommendations with specific reference to music venues in planning policies due to their economic, cultural and social value. Support for creative arts including art and music in particular came through strongly in representations submitted

during the consultation period; therefore part (2) enhances protection for existing venues by setting out guidance for development proposals in proximity to such venues.

Policy Implementation:

Part (1) sets out that a noise assessment should include an assessment of the 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; the spectral content of the noise: where applicable, 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.

For part (1), where the avoidance of noise conflicts is impractical, mitigation measures such as effective sound-proofing for noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

To satisfy part (2), 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 the Council is not satisfied that the operations of nearby uses would not be compromised, applications will be refused.

Part (3) sets out that heating and ventilation plant should be designed so that it does not adversely affect nearby open spaces which are valued for their quiet environment.

Applications should be considered alongside Policy SG2 of the plan.

Policy DH9 Overheating

- Proposals for new development will ensure that buildings and spaces are designed to avoid overheating and excessive heat generation internally and externally, while minimising the need for internal air conditioning systems, taking into account the guidance within the Mayor of London's Climate Change and Adaptation Strategy.*

Justification

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.

Developments, especially when large, can alter the local climate. For example, a light coloured building that reflects heat will stay cool on the inside and the outside, where as 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.

Policy Implementation

The Council will expect development proposals for major development schemes should set out within the Design and Access Statement the measures included to avoid overheating (including overheating analysis against a mid-range climate scenario for the 2030s) and excessive heat generation. It should look at not only the physical form of the building but also the operation of the building.

This policy should be read alongside London Plan policy 5.9 which provides 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 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.

Applications should be considered alongside policy SG1 and the relevant environmental sustainability policies included in the Plan.

Policy DH10 Shopfronts

1. *Shopfronts will be well-designed and ensure:*
 - a. *the maintenance of active shopfronts at all times;*
 - b. *the provision of a sense of activity behind the shopfronts: this will be enhanced by a well-considered internal layout, and it will not be blocked due to overly-covered shopfront windows;*
 - c. *a sensitive relationship between the shopfront and the upper floors;*
 - d. *a sensitive relationship with surrounding shopfronts and buildings;*
 - e. *the use of materials which are appropriate to and enhance the local character, and the value and age of existing architectural and historic features;*
 - f. *the provision of sensitive signage location and design, which is not overly dominant to the shopfronts and the buildings; and*
 - g. *avoidance of neon lighting, animated electronic displays and external solid shutters*

Justification

Part (1)(a to g), attractive and well-designed shopfronts contributes to the creating successful places through the provision of natural surveillance, positive contribution to streets and public realm and supporting the vitality of an area. It is important that new shopfronts are well designed and make a positive contribution streets and spaces and therefore enhances the overall character of the Borough's character and places.

Policy Implementation

Part (1a-g), 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.

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. 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.

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.

Policy DH11 Advertisements and Hoardings

1. *Advertisements and hoardings will be well-designed and integrated by demonstrating that:*

- a. *they do not harm the character, appearance and visual amenity of the site and the surrounding area;*
- b. *they do not intrude into the outlook of nearby residents;*
- c. *they do not have an adverse impact on public or highway safety;*
- d. *they enhance the visual amenity of vacant sites and building sites and the surrounding area; and*
- e. *they are not overly prominent or dominant in relation to the streetscape or the buildings that they are attached to*

Justification

This policy aims to ensure the appropriate design and location of advertisements so they do not detract from the public realm, or character of a local area and they do not create a safety hazard.

Policy Implementation

This policy supplements the strategic policies DH1 and DH2. This policy relates to advertisements such as fascia and hanging shop signs, poster panels and free standing advertisements. It recognises that these can make a positive contribution to the public realm and can play an important role in providing local information.

In order to ensure that a proliferation of advertisements does not result in visual clutter, the number, scale and siting of advertisements is important. Advertisements should not obscure historic and architectural features, they should not be located above ground floor level (this includes adverts as part of screens for vacant sites or building sites) and there should be no more than one hanging sign per building.

In reflecting the character and type of development, advertisements will not be supported on residential buildings above ground floor level or extended outside of the building envelope. Illumination is an important consideration in respect of adverts. They should be in keeping with the character of the area and should not negatively affect amenity of surrounding residents or highway safety. One way to enable this is to ensure they are static.

Policy DH1 Telecommunications

1. *Telecommunication development will be well-designed and integrated and mitigate any impacts on the surrounding area and communities by:*
 - a. *demonstrating that it considers any alternative sites, mast sharing and the use of existing buildings;*
 - b. *including details of frequency modulation, power output and evidence of how the proposal meets the International Commission on Non-Ionising Radiation Protection; and*
 - c. *using design of the development features to address the impact on the street scene and heritage assets*

Justification

This policy aims to ensure the appropriate design and location of telecommunications they do not detract from the public realm, or character of a local area and they do not create a safety hazard.

Policy Implementation

This policy provides guidance about the siting and design of telecommunications development which include antennae and cabinets. It is important to ensure that any equipment shares existing infrastructure and is of a suitable design taking into consideration heritage assets, height, scale and materials of the site and local area.

3. Housing in Tower Hamlets

Introduction

The Council is required to maximise housing supply to meet local and strategic need within the parameters of the NPPF definition of sustainable development⁸, London Plan targets and the locally specific character and context of the borough.

The proposed Vision for Tower Hamlets (chapter three) supports provision of a wide range of housing types with family and affordable housing prioritised, served by a range of excellent, shared and accessible services, community and recreation facilities and infrastructure such as schools, health facilities and parks etc. To achieve this, the Council will need to **“Managing growth and shaping changes”** through:

- Delivering Tower Hamlets’ regional role as a key location for London’s housing and employment growth, while calling for adequate recognition of this role through regional and national investment prioritisation.
- Positively meeting the duties to deliver our strategic housing based on a proper evidenced assessment of infrastructure capacity, need for infrastructure investment and delivery; and

“Spreading the benefits of growth” from housing developments through:

- Reducing existing spatial inequalities and barriers and preventing the future polarisation of areas or communities, through maximising regeneration opportunities, in particular in South Poplar, the Lower Lea Valley and the Isle of Dogs.
- Ensuring housing contributes to the creation of socially balanced and inclusive communities by offering housing choice reflecting the Council’s priorities for genuinely affordable and family homes.

This section contains the following policies:

- Strategic Policy H1 Delivering Housing
- Policy H2 Affordable Housing
- Policy H3 Housing Standards and Quality
- Policy H4 Specialist Housing
- Policy H5 Gypsy and Traveller Accommodation
- Policy H6 Student Housing

Background

The London Plan’s Housing Supply Target (2015-25)

Policy 3.3 of the adopted London Plan identifies a 10-year minimum housing supply target of 39,314 homes for Tower Hamlets over the period 2015-25. This is equivalent to a minimum requirement of 3,931 homes per annum. Amongst all the London local authority areas Tower Hamlets has the highest target and has been given a target to supply approximately 9% of London’s total annual housing target .

The London Plan target is informed by GLA’s evidence on both the land capacity for housing and the need of housing - the London Strategy Housing Land Availability Assessment 2013 (the London SHLAA) and the London Strategic Housing Market Assessment 2013 (the London SHMA).

The London Plan does not set out specific housing targets for Local Plans planning beyond 2025. However, given the imperative to address London’s housing need, Policy 3.3 of The London Plan states that:

⁸ Paragraph 14 of the National Planning Policy Framework (DCLG, 2012)

“... if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target. Boroughs should draw on the housing benchmarks in Table 3.1 in developing their Local Development Framework (LDF) housing targets, augmented where possible with housing capacity to close the gap between identified housing need...and supply in line with requirement of the NPPF...Boroughs must identify new, and review existing housing sites for inclusion in LDFs.”

For the purpose of the Draft Local Plan at this stage, the Council has taken account of the London Plan policy requirements, and rolled forward the target beyond 2025 to 2031. So the borough has the duty to provide a minimum of 62,892 new homes between 2015 and 2031.

The London SHLAA

The most recent London SHLAA (2013)⁹ identified an overall capacity of 39,314 units for Tower Hamlets over the period 2015-25. The majority of the new housing capacity was identified on “large housing sites (0.25ha+)”. This was achieved through working with the Council to identify sites that could be suitable for housing development, including sites with planning permission, assessment of other non-committed sites (submitted or identified by GLA, Tower Hamlets, public), including constraints (e.g. designated open space, designated employment land and protected wharfs etc.) and considered the probability of sites that could come forward for housing between 2015 and 2025. Although the methodology applied was fit for purpose at the time, it lacked a comprehensive understanding of local constraints, deliverability and developability of the sites that may come forward over the term of the London Plan.

Tower Hamlets’ London Plan housing target is greater than the DCLG’s household projections. It is considered that the current borough housing target goes beyond providing housing for meeting the local need, but also providing housing for meeting the strategic London need. It is also considered that the current London Plan housing targets are capacity driven which has not taken account for the local circumstances such as how developments coming forward in Tower Hamlets (e.g. build out rates of the industry). It is therefore important for the borough to undertake further research to help understand the delivery of residential development in Tower Hamlets as part of the Local Plan preparation.

At the time of writing, a “Call for Sites” is being undertaken by the GLA. Its findings will be used to inform the update and review of the new London SHLAA 2016 and the subsequent evidence for the emerging London Plan. The Council will work with the GLA to inform the sites identified as part of this exercise, which may change the Tower Hamlets housing supply target in the new London Plan. As a result the Council will revise the overall housing supply target for the new Local Plan.

The London SHMA¹⁰ (2015 – 2036)

The London SHMA (2013) indicates that the capital will require between 48, 841 and 62,088 new homes per annum. The difference is resulted from the timescale applied to clear the backlog over a shorter period and to account for different levels of population change in London.

Housing requirement for the new Local Plan

Tower Hamlets commissioned its own SHMA (2014) to consider in greater detail of the local context and drivers for housing need in the area. The report identified an Objectively Assessed Need (OAN)¹¹ of 58,274 additional homes for Tower Hamlets over the period 2011-2035, which is equivalent to a requirement of 2,428 per annum over the 24 years period. It suggested Tower Hamlets, along with London Borough of Hackney should be considered together as part of a sub-market housing area for the purpose of assessing local housing need.

⁹ FALP SHLAA 2013 (GLA, 2014): <https://www.london.gov.uk/file/15569/download?token=M9dckY12>

¹⁰ FALP SHMA 2013 (GLA, 2014): <https://www.london.gov.uk/file/15571/download?token=q4aeX4gP>

¹¹ Refer to guidance published by the Planning Advisory Service: <http://www.pas.gov.uk/documents/332612/6549918/OANupdatedadvicenote/f1bfb748-11fc-4d93-834c-a32c0d2c984d>

To be in conformity with the London Plan; the Local Plan seeks to deliver at least 39,314 homes between 2015 and 2025, and consider exceeding this target based on the GLA’s emerging housing land supply evidence.

Housing growth

In order to meet both the local housing needs and the strategic London housing needs, the Council has made a broad assumption on the housing development trajectory over the Draft Local Plan period. Details are set out in the Council’s latest five-year land housing supply¹².

Based on the Council’s data, the majority of the housing will be provided in the following Areas:

- City Fringe Sub Area: Whitechapel, Spitalfields & Banglatown, parts of St Katharine’s & Wapping and Weavers
- Isle of Dogs & South Poplar Sub Area: Canary Wharf (incl. Island Garden), Blackwall & Cubitt Town and Poplar
- Lower Lea Valley Sub Area: Lansbury, parts of Bromley North & Bromley South
- Central Sub Area: Mile End, parts Bromley North & Bromley South

The figures below are based on strategic sites identified for the potential Site Allocations (see Appendix Three). The estimated capacity does not include an allowance for emerging opportunities for redevelopment and intensification for housing developments in the Isle of Dogs through the emerging Opportunity Area Planning Framework work and additional sites to be identified through the next London SHLAA 2016. The figures represent a cautious estimate of Tower Hamlets housing land supply position in relation to the London Plan (2015) target and the OAN identified through the Tower Hamlets SHMA (2014).

Table 2 Maximum number of additional homes by Sub Areas (2015 - 2031)

	Minimum Number of Additional Homes between 2015-31
Isle of Dogs & S. Poplar	26,350
City Fringe	10,600
Lower Lea Valley	7,200
Central Area	6,300
Smaller sites (less than 10 units)	2,450
LB Tower Hamlet Total	52,900

* Note: Site capacity is informed by live planning applications, masterplans and permissions for these sites. Where site capacity is unknown, it was assumed a minimum of 500 homes would come forward on each site over the plan period. Figures have been rounded down to nearest 100 units. This is a cautious estimate of the minimum capacity for strategic housing sites. These figures are subject to change pending discussion with developers/landowners/site promoters.

The following draft policies provide guidance on the borough’s overall target for new homes, including affordable housing, and for how new housing can be provided.

¹² Tower Hamlets Annual Monitoring Report 2014/15 (LBTH, 2016)

Strategic Policy H1 Delivering Housing

1. *The Council seeks to deliver 39,310 new homes (equating to 3,931 per year) between 2015 and 2025 in line with the housing supply targets established in the London Plan and rolling forward a reasonable target as appropriate over the Local Plan period. This will be achieved by:*
 - a. *focusing the majority of new housing, in the following Areas:*
 - i. *City Fringe Sub Area: Whitechapel, Spitalfields & Banglatown, parts of St Katharine's & Wapping and Weavers*
 - ii. *Isle of Dogs & South Poplar Sub Area: Canary Wharf (incl. Island Garden), Blackwall & Cubitt Town and Poplar*
 - iii. *Lower Lea Valley Sub Area: Lansbury, parts of Bromley North & Bromley South*
 - iv. *Central Sub Area: Mile End, parts Bromley North & Bromley South*
 - b. *ensuring development does not undermine the supply of conventional housing and in particular family homes;*
 - c. *resisting development that would involve a net loss of residential floorspace;*
 - d. *working with Registered Providers to support the regeneration of housing estates where open space, existing homes (including affordable and family) are protected, and where homes are brought up to a high quality standard;*
 - e. *and working to return vacant homes back to use*
2. *The Council supports the creation of mixed and balanced communities that respond to local and strategic need by:*
 - a. *setting an overall strategic target for affordable homes of 50% subject to viability. This will be achieved through:*
 - i. *securing affordable homes from a range of Council led initiatives; and*
 - ii. *requiring 35% - 50% affordable homes on sites providing net additional residential units (subject to viability).*
 - b. *Requiring a mix of housing sizes and tenures on all sites providing new housing.*
 - c. *Supporting a variety of housing products in the market and affordable tenure.*
3. *The Council seeks to ensure that all new housing contributes positively to the creation of sustainable places by:*
 - a. *ensuring new developments optimise the use of land and do not show symptoms of overdevelopment;*
 - b. *linking the distribution and density levels of housing to public transport accessibility levels and the setting in accordance with the London Plan as well as the wider accessibility of that location;*
 - c. *ensuring the distribution and density levels of housing according to the hierarchy and proximity of the nearby town centres, so that higher densities are promoted in and around town centres that are higher up in the hierarchy, and lower densities in town centres lower down in the hierarchy; and*
 - d. *ensuring design takes account of cumulative development.*
4. *The Council seeks to ensure that all housing is appropriate, high-quality, well-designed, sustainable, and appropriately takes account of cumulative development. This will be*

achieved by applying relevant space, accessibility and housing amenity standards and encouraging development to apply the Home Quality Mark standards¹³.

5. *The Council seeks to provide for the specialist housing needs of the borough including students, gypsies and travellers, older, homeless and vulnerable people in appropriate locations.*
6. *The Council is in favour of developments which encourages a reasonable proportion of sales to UK citizens for owner-occupation.*

Justification

This policy aims to set out overarching requirements for delivering new homes in Tower Hamlets, in line with the London Plan and NPPF.

Policy Implementation

This policy sets out the strategic housing supply requirements for Tower Hamlets, as well as the Council's objectives of ensuring the creation of mixed and balanced communities, sustainable places and quality living environments within the borough. The following text and policies will assist in realising these strategic and Council led priorities.

Tower Hamlets housing supply target relates to total net housing supply. The strategic target specified in Part (1) applies to conventional residential units and non-self-contained residential accommodation including specialist housing for students and older people in use class C2, C3, C4 or Sui Generis as identified in Annex 4 of the London Plan (2015). For the purposes of calculating housing supply and monitoring its delivery, applicants should note that a bedroom in a non-self-contained residential accommodation is classified as a single residential unit and conventional units are classified as self-contained homes from new build, conversions or changes of use.

Housing growth detailed in Part (1) will be delivered in the locations specified in part (1a) and 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, bringing back long term vacant properties into residential use and windfall sites. Further details can be found in chapter five: Delivering Placemaking.

Part (1b) seeks to ensure the supply of conventional housing to meet identified local need as well as strategic targets. Part (b) gives greater priority to conventional units¹⁴ over non-conventional units as it is recognised that some forms of housing do not meet an identified local need such as serviced apartments or student housing. Residential development will be considered accordingly to ensure the availability of land for conventional housing. Part (b) also relates to development that would result in the net loss of residential floorspace or units. It requires that its loss is resisted, particularly where it is family and affordable housing.

Part (1c) seeks to protect all housing floorspace where people live long-term.

Part (1d) and (1e) will be implemented through partnership working to realise local priorities and need as well as strategic targets. The Council's Housing Strategy will inform this process. Vacant units brought back into residential use contribute towards meeting the housing supply figure.

¹³ Refer to: <http://www.homequalitymark.com/>

¹⁴ Non-self-contained residential accommodation (non-conventional units) including specialist housing for students and older people may count towards housing targets for monitoring purposes (whether in use class C2, C3, C4 or SG) (GLA, 2015).

Implementation of Part (2) requires balancing housing need with deliverability. Part (2) seeks to continue to pursue a strategic affordable housing target of 50% through private development as well as Council-led initiatives. On developments that yield net additional residential units, a minimum of 35% affordable housing is expected. Given the Council's need for affordable housing, it is considered necessarily and locally appropriate to seek contributions from sites of less than 10 units. Over the course of the plan period developments on sites have potential to contribute between 600 and 100 new homes over the plan period. Negotiations will be conducted with planning and housing officers and will be subject to viability. The detailed implementation of this policy can be found in Policy H2.

Part (2b) expects that all housing developments will contribute to the realisation of mixed and balanced communities. Private student and specialist housing will be required to deliver a mix of affordable and market accommodation and all other housing development will be required to deliver a mix of housing tenures and sizes on site.

Part (2c) seeks to support housing products such as Build to Rent Private Rented Sector (PRS) housing, and self-build and custom build 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. Where applications come forward they will be required to demonstrate how they facilitate this through consideration of household incomes in relevant locations. They will also be required to meet with the criteria specified in 3.51 of the London Housing SPG (2016).

Part (3) establishes a link between housing policy and placemaking policy in Chapter 5: Delivery Placemaking. The creation of mixed and balanced communities is an on-going priority for the Council and their creation will be implemented through spatial planning of places and the delivery of a mix of housing typologies and tenures on each site. Part (3a) requires optimisation of land in accordance with the definition given in 1.3.1 of the Mayor of London's Housing SPG. It should also have regard for the effective management of infrastructure and resources on site as well as the benefits of mixed use development in suitable locations to aid the creation of sustainable communities.

Part (3b) and (3c) require development to give consideration to density in light of wider accessibility considerations and the site location and its relationship with the town centre hierarchy. Density calculations for mixed use development should be calculated in accordance with the London Plan Housing SPG (2016). High density development will be permitted when it does not show symptoms of overdevelopment and demonstrates how the cumulative impacts of development on the (existing and proposed) environment have mitigated any harmful impacts through providing for infrastructure needs generated by a new development. The Council considers "Overdevelopment" as:

- inadequate access to sunlight and daylight for proposed or neighbouring homes;
- sub-standard dwellings (size and layouts);
- insufficient open space (private, communal and/or publicly accessible);
- unacceptable housing mix;
- unacceptable sense of enclosure or loss of outlook for neighbouring occupiers;
- unacceptable increase in traffic generation;
- detrimental impacts on local social and physical infrastructure; and,
- detrimental impacts on visual amenity, views or character of surrounding area.

The London Plan defines density in terms of net residential area; however developments are encouraged to consider density beyond the application site.

Part (4) requires development proposals appropriately to respond to the character of the surrounding area and site specific constraints. In high density environments it is appropriate to undertake an assessment of the overall quality of housing. This also requires housing design to meet to the Home Quality Mark (HQM) standards and address the needs of the user. This is a new residential quality design and construction standard, developed by the BRE. The Code for Sustainable Homes was withdrawn by a ministerial statement in March 2015, and the HQM is an optional standard that housebuilders can accord with to demonstrate the quality of their homes in the absence of the Code for Sustainable Homes. The Council's Housing Department will also expect affordable homes to be

delivered in line with the standards set out in the emerging Tower Hamlets Affordable Housing Design Guidance.

Part (5) recognises the Council's duty, to provide specialist and supported housing for students, gypsies and travellers, the homeless vulnerable and older people. Part (5) will be achieved through working with partners to facilitate the appropriate quantity and quality of housing as well as through development management.

Part (6) aims to prevent distorting housebuilding priorities and encourage developers to provide at least one-third of sales to the UK citizens for owner-occupation.

Policy H2 Mixed and Balanced Communities

1. *The Council seeks to maximise affordable housing in accordance with Policy H1 and requires delivery of housing in accordance with a 70% Rent and 30% Intermediate tenure split.*
2. *Development will be required to demonstrate how the Rent and Intermediate tenures will contribute to the policy objective of maximising affordable housing as further set out in the Council's Housing Strategy to meet the full range of housing needs.*
3. *Development will be required to maximise the delivery of affordable housing on-site.*
 - a. *Any off-site affordable housing will only be considered in circumstances where it can be demonstrated that:*
 - i. *it is not practical to provide affordable housing on-site;*
 - ii. *to ensure mixed and balanced communities it does not result in too much of any one type of housing in one local area;*
 - iii. *it can provide a minimum of 50% affordable housing overall;*
 - iv. *it can provide a better outcome for all of the sites including a higher level of Rent family homes; and*
 - v. *future residents living on all sites should benefit from the same level and quality of local services.*
 - b. *If a suitable site cannot be found in accordance with parts 3(a), exceptional circumstances may apply and the Council will consider payments in-lieu ring fenced for additional affordable housing output.*
 - c. *Affordable housing calculations will use habitable rooms as a primary measure to allow for the most suitable mix of affordable housing.*
 - d. *Where a housing development has been permitted and the permission is either:*
 - i. *subsequently amended (e.g. by means of a variation of the extant planning permission) to the extent that the amended development would provide 10 new units or more in aggregate, or*
 - ii. *the existing development is extended by the granting of a new permission on an adjoining site where the buildings 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 10 new units or more in aggregate*
 - e. *the affordable housing policies will be applied to the whole development and not restricted to the additional number of dwellings in the amended or new proposal.*
4. *Affordable housing should be built to the same standards as private housing.*

5. *Development should provide a balance of housing types including larger family homes in accordance with housing need. Unit size splits will be calculated by unit numbers and not habitable rooms.*
6. *The Council will ensure the efficient use and retention of existing family housing by:*
 - a. *resisting conversion of houses of up to and including three storeys suitable for single family use unless there is a local need of smaller units.*
 - b. *resisting conversion of houses of four or five storeys except where a basement flat and three/four storey maisonette is formed or where there is a local need for smaller units. Where suitable the maisonette should have access to a garden.*
 - c. *Resisting development that results in the net loss of residential floorspace or units*
7. *Developments for estate regeneration will be required to:*
 - a. *fully reprovide existing affordable homes and increase additional net affordable housing units, by applying Policy H1 to all new additional units; and*
 - b. *help meet the Council's housing priorities as further set out in the Housing Strategy.*

Justification

There is an acute need for affordable homes across London and in the borough. There is a shortfall of family housing as identified in the Tower Hamlets Strategic Housing Market Assessment (SHMA), 2014. Like some other London boroughs, the Council faces considerable challenges in delivering homes which are affordable to local people on average incomes. The Mayor of Tower Hamlets recognises the challenge and considers that delivery of family housing and social rented affordable housing to meet the needs of our community is a top priority for the Council, and therefore for the Local Plan.

In terms of tenure split for affordable homes, 70% Rent and 30% intermediate is required as per the Council's emerging Housing Strategy and to meet the Borough's affordable need in line with the LBTH SHMA, 2014. The current Local Plan policy on affordable housing tenure split differs from the London Plan. This departure was considered acceptable by the Planning Inspectors who examined the Core Strategy in 2010 and the Development Management Document (2013), as it reflects the local circumstances. In addition, the council has worked closely with the GL's London Plan and emerging Affordable Housing SPG on the drafting of this policy, and this is consistent with the emerging policy.

The Council's existing affordable housing policies are consistent with the current NPPF. However, there are a number of proposed governmental changes to national planning legislation and guidance that may influence the content of the affordable housing policies in the next iteration of the Local Plan. These key aspects are outlined below and are addressed in the emerging Housing Strategy (2016).

The new proposed changes include: Starter Homes - these are homes will be sold at 80% of market prices for those under 40 years of age, with an upper limit of £450,000 in London. The Starter Homes Regulations – Technical Consultation (March 2016) proposes a minimum requirement of 20% of all homes (over 10 units) to be Starter Homes; and consultation on Proposed Changes to National Planning Policy (December 2015) - this proposes a number of changes including a change to the definition of affordable housing which places greater emphasis on supporting households to access home ownership (such as starter homes) and provision of a range of products as affordable housing including affordable housing to rent or buy (including starter homes), and potentially the tenure split.

The Council is opposed to the changes proposed, out of concerned that this will have a negative effect on the amount of genuinely affordable housing products such as Social Rent, Affordable Rent and Intermediate required to meet the Borough's housing needs in the new Local Plan.

At this stage, it is not possible due to lack of detail or necessary in planning terms to apply the proposed changes to the policies contained in the Draft Local Plan. However, if the changes come into force in advance of the next iteration of the new Local Plan, the Proposed Submission Local Plan, then the affordable housing policies and any other policies may need to be reviewed as a result.

Policy Implementation

Policy H1 sets out the Council's overall target for new homes, including affordable housing, and provides guidance for how new housing should be provided. Policy H2 provides further detailed guidance for how development can help to deliver new homes to meet the full range of needs of existing and future residents of the borough.

Part (1) details the requirement for proposals to meet an affordable tenure split of 70/30 Rent and 30% Intermediate. Regulations pertaining to Starter Homes are not currently available. Tower Hamlets Council is intended to create its own Tower Hamlets Living Rent which will be a rented product. More details will be set out in the emerging Housing Strategy (2016).

In meeting policy objectives for affordable housing policy part (2), the Council will give favourable consideration to proposals which exceed its strategic target of affordable housing and family housing in the social rent tenure. Part (3) provides the basis for the Council to assess development proposals with affordable housing provision on site. Tower Hamlets Affordable Housing Team will provide further guidance when assessing applications.

Applications with below market Rent products (exclude the GLA London Living Rent)¹⁵ should demonstrate are in compliance with Policy H2. 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; and the ownership of Affordable homes is transferred, on completion, to one of the Council's approved local Registered providers or approved affordable housing providers.

Estate regeneration schemes are required to replace existing social rent units, or deliver larger homes, which are prioritised for Social Rent.

Part (3) recognises that in some circumstances site constraints may lead to applicants proposing to provide affordable housing off-site or through payments in-lieu in order to be able to contribute to the delivery of affordable housing and in particular Social Rent family housing. The GLA 's Housing SPG (2016) states: "where the design and layout of the scheme has been agreed, boroughs should take account of the potential practical implications of delivering increased amount of affordable housing on site which may mean a commuted sum would be acceptable." The Council considers that in the majority of cases, it is viable for affordable housing to be delivered on-site. This is important in promoting mixed and balanced communities.

If affordable housing is proposed to be provided 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 (subject to viability). Furthermore, the design of the off-site development, the living environment for residents and other elements of the scheme, must all be demonstrably better than if affordable housing was provided on-site. All residents must be able to access the same level of local services such as local shops, public transport interchanges and public open space.

Part (3b) requires that if no suitable sites are available for off-site affordable housing and payment in-lieu is to be acceptable then the development must demonstrate that the payment will enable the construction or purchase of a minimum of 50% affordable housing and there is no financial advantage to the development of not providing affordable housing on-site.

¹⁵ Refer to: <https://www.london.gov.uk/what-we-do/housing-and-land/renting/london-living-rent>

Part (3c) will require proposals to calculate affordable housing using habitable rooms as it ensures the provision of a range of housing sizes more likely to achieve the requirements as identified within the latest housing needs assessment (LBTH SHAM 2014).

Part (3d) 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 10 new units or more in aggregate, or the existing development is extended by the granting of a new permission on an adjoining site where the buildings 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 10 new units or more in aggregate.

Part (4) will require development to secure the same space and amenity standards and equal quality of design and external appearance for affordable housing as private housing, as well as securing the same access to services and facilities. Different tenures should be mixed throughout a development, although it is recognised that separate cores may be required to enable effective management arrangements.

Part (5) requires proposals to meet with local need through delivering housing in accordance with the table below.

Tenure	1-bed %	2-bed %	3-bed %	4+ bed%
Intermediate (London/Tower Hamlets Living Rent)	56%	12%	16%	2%
Social	35%	30%	30%	5%

Source: LBTH SHMA (2015)

Note: Figures set out in the table have been rounded up or down.

Given the high targets for the provision of new housing in the borough, part (6) is a critical development management tool, ensuring priority affordable and family housing is not lost through development, thereby having a detrimental impact on meeting housing need and housing supply. To manage the current shortage of family homes, the Council will resist proposals to convert family homes into smaller self-contained flats. This includes residential uses identified as hostels or other forms of shared accommodation. Exceptional circumstances may include the delivery of new family homes, which is considered as a priority for the Council.

Policy H3 Housing Standards and Quality

1. *All housing delivery should have an adequate provision of internal space and accessibility arrangements and meet relevant space and amenity standards in order to provide an appropriate living environment. Developments will need to demonstrate:*
 - a. *that as a minimum it meets with the most up to date London Plan space and accessibility standards, the Home Quality Mark and affordable housing should aim to meet the standards included in the Borough's emerging Affordable Housing Design Guidance;*
 - b. *that it provides a minimum of 2.5m floor to ceiling heights; and*
 - c. *that provision of 10% of homes to be designed so that are suitable for occupation by a wheelchair user or could easily adapted for occupation by a wheelchair user; where units are above the ground floor must have access to a second lift*

2. All development should protect existing amenity space (private, communal and child play space). Net loss of existing amenity space will be resisted.
3. All new housing developments should have an adequate provision of amenity space (private, communal and child play space) to ensure an appropriate living environment. Developments will need to demonstrate how they will meet the following standards on site as a minimum in accordance with table 8 below:

Table 3 Amenity space and child play space standards

Minimum private amenity space provision (e.g. gardens, balconies and winter gardens)	
Apply the London Plan Housing SPG, Standard 26 and 27 which specify: <ul style="list-style-type: none"> • a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant • balconies and other private external spaces should have a minimum width and depth of 1500mm 	
Minimum communal amenity space provision (does not include circulation areas, access routes, waste or bike storage)	
All development with 10 or more residential dwellings	50sqm for the first 10 units plus a further 1sqm for every additional unit thereafter
Child Play Space	
<ul style="list-style-type: none"> • Apply London Plan supporting guidance standards which specifies 10sqm of play space should be provided for each child. ('Shaping Neighbourhoods: Play & Informal Recreation SPG') • Apply Tower Hamlets child yields. (LDF Tower Hamlets Planning for Population Change and Growth, Capacity Assessment-Baseament Report, Final Report, August 2009) 	

Justification

Currently, Tower Hamlets is London's second densest London borough after Islington. Given the further intensification of land use resulting from accommodating a significant amount of housing and associated infrastructure, an appropriately quality-driven response is required to maintain and improve standards of living in the Borough.

High density developments necessitate that development appropriately responds and delivers more than the minimum in terms of standards related to design, space and amenity. The Council considers it is important to focus on design for high quality housing, which appropriately takes account of cumulative development with regards to ensuring adequate opportunity for people to enjoy their homes as places to sleep, relax, cook and work.

Tower Hamlets has a particular need for wheelchair accessible family sized homes in the affordable tenures. We also require design which allows for sufficient space for children to play close to home, for clothes to dry, suitable space for people to work from home and for prams, wheelchairs and mobility scooters as well as the preference of many families for separate rooms for preparing meals.

Policy Implementation

This policy provides guidance regarding setting the minimum housing design standards and the provision of housing amenity space for new conventional homes. It seeks to ensure the combination of indoor and outdoor space provides homes that are suitable for residents over their lifetime and provides a healthy environment in which to live, work and relax.

The aim of part (1a) of this policy is to require development to comply with the most up to date space and accessibility standards set out in the London Plan (2015) and the Mayor of London's Housing SPG

(2016) as a minimum and have regard for the particular needs of residents in the borough as well as the increasingly dense character of the built form. This also requires housing design to meet to the Home Quality Mark (HQM) standards and address the needs of the user. This is a new residential quality design and construction standard, developed by the BRE. The Code for Sustainable Homes was withdrawn by a ministerial statement in March 2015, and the HQM is an optional standard that housebuilders can accord with to demonstrate the quality of their homes in the absence of the Code for Sustainable Homes. The Council's Housing Department will also expect affordable homes to be delivered in line with the standards set out in the emerging Tower Hamlets Affordable Housing Design Guidance. It should be noted the Council is working on affordable homes design guidance and there will be an expectation that applicants meet with this. It should also be noted that negotiations related to standards, in particular local guidance, will take place with housing officers.

The implementation of part (1c) will be assessed on a case by case basis. This could include where development cannot meet H3 (1c), the Council may consider using commuted sum. To implement part (1c), 10% of all new units should be wheelchair accessible, but this may be varied to 10% of habitable rooms where a better outcome is provided in terms of provision of larger units. Wheelchair accessible units above the ground floor must be provided with access to a second lift for use when the primary lift is not functioning.

Through implementing part (2) of this policy the Council aims to ensure that all existing amenity space is protected.

Part (3) of the policy seeks the provision of new outdoor amenity space to be well-located, well-designed and functional, including private amenity space, communal amenity space and child play space to provide opportunities for residents to lead healthy and active lifestyles.

This policy will also seek the provision of new amenity space to be on-site, well-located, easily accessible to all residents (private amenity space excepted), well-designed and functional. In considering the design of private amenity space it is important the space meets the minimum standards set out in table 8 in order to ensure that residents have sufficient space to carry out activities such as enjoying a meal outside and drying clothes. Due to the positive impacts of access to nature in terms of wellbeing, a significant amount of amenity space should be soft landscape. This also provides greater opportunity to incorporate 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 support a range of activities including space for relaxation, gardening, urban agriculture and opportunities to promote biodiversity and ecology.

In considering the design and layout of child play space it is important to ensure that this responds to the needs of local children within the development taking consideration of existing provision in the area. As a requirement, play space for children under 5 should always be on site. This space should be well-integrated into the development as well as a consideration in the design of the communal space provision. However, it is important to note that the standard for play provision is in addition to other quantitative standards such as open space provision and communal space provision. Applicants should follow the Council's guidance on child play space.

Policy H4 Specialist Housing

- 1. Existing specialist and supported housing, including sheltered housing, care homes and accommodation for older people (such as extra care accommodation, assisted living and retirement housing) will be protected where it is considered suitable for its use and meets relevant standards for this form of accommodation.*
- 2. The net loss of this form of accommodation will only be supported where it can be demonstrated that:*

- a. *the needs met by this form of accommodation can be re-provided elsewhere in the Borough; and*
 - b. *re-provision as part of a development proposal would result in improved standards or quality of accommodation.*
3. *The redevelopment of any site which includes specialist and supported housing will be 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 can be re-provided elsewhere within the borough;*
 - c. *re-provision as part of a development proposal would result in improved standards and quality of accommodation; and*
 - d. *new accommodation meets criteria in part 4 below.*
4. *Proposals for new specialist and supported housing will be supported where it can be demonstrated that the developments meets :*
- a. an identified need;
 - b. the relevant guidance for this form of accommodation;
 - c. is located in close proximity to public transport and local shops and services; and
 - d. it provides a mix of housing across tenures where appropriate.

Justification

The Council will aim to ensure that there is a sufficient supply of appropriate housing available for older people, homeless people and vulnerable people to live as independently as possible in accordance with its statutory duties. The emerging Housing Strategy (2016-2021) seeks to meet the needs of the various groups of people involved. With regards to older people the Council aims to:

- Provide a range of good quality accommodation and access to home adaptations and improvements that offers older people housing that meets their needs;
- Help older people to continue to remain active, independent and healthy in their homes supported by flexible and affordable services; and
- Develop a specific approach that meets the needs and wishes of older people that will help incentivise households who are under-occupying by giving them a wider range of choice. This aim recognises that there is a large and growing cohort of older people who do not require institutionalised care as well as those who do, often through extra care schemes.

The Housing Strategy has been developed and informed by the housing evidence base that supports this document.

Policy Implementation

Strategic Policy H1 (5) requires the Council to provide for specialist and supported housing to cater for older people, homeless people, disabled, and vulnerable people to meet the needs of the borough's residents and Council's duties. The Council will work with registered providers and other relevant partners to support provision of specialist and supported housing where there is an identified local need.

In implementing Part (2) proposals will need to submit an assessment relating to need for the net loss of accommodation.

Part (3) will require proposals for redevelopment to justify the appropriateness of redeveloping the site without specialist and supported housing on site. It should have regard to the suitability of the location and criteria (a-d) of Part (4).

Part (4) requires new development to demonstrate that it is accessible in terms of mobility and location. Close proximity to local services is considered to be a walkable distance of no more than 10 to 15 minutes. It has necessary storage for mobility scooters. Older persons housing will be required to be delivered across tenures in accordance with Annex 5 of the London Plan, however it should be noted that older people's housing in the affordable tenure meets an identified need in the Borough.

All proposals for specialist and supported housing will be referred to the Council's Adults Health and Well Being Directorate to consider the approach to safeguarding and to ensure that a good quality service can be provided to vulnerable people.

Policy H5 Gypsy and Traveller Accommodation

1. The Council will safeguard the existing Gypsies and Travellers site at Old Willow Close.
2. The Council will secure any additional pitches that come forward as a result of Crossrail development at Old Willow Close.
3. Proposals for new site(s) for additional permanent facilities within the borough to meet the long-term needs of gypsies and travellers will be required to have regard to:
 - a. having been identified as suitable for housing;
 - b. being in an accessible and safe location;
 - c. employing high quality design and be sympathetic to the local character;
 - d. maintaining and enhance the quality of the environment; and
 - e. not be located in an area of high flood risk (Flood Zone 3)

Justification

The government published a revised Planning Policy for Traveller Sites (PPTS) in August 2015. This document changes the definition of gypsies and travellers and travelling showpeople. For planning purposes, the Council uses the PPTS definitions of gypsies, travellers and travelling showpeople outlined below:

Gypsies and travellers

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such."

Travelling showpeople

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

The Council commissioned Tower Hamlets Gypsy and Traveller Accommodation Assessment (GTAA) that uses the new definitions to provide a robust revised assessment of current and future need for Gypsy and Traveller accommodation in the borough (there is no Travelling Showperson provision in Tower Hamlets) for the period 2016-2031.

Evidence shows that one household in the borough meets the new definition of a Traveller with additional need from this household for 1 pitch. The evidence base was unable to determine the travelling status of 4 households. Associated need for this entity could range from 0-4 pitches plus any

additional need from concealed households¹⁶. The borough has one public gypsy and traveller site with 19 existing pitches at Old Willow Close, formerly known as Eleanor Street. Thus, the needs can be met through existing provision. It is considered that Old Willow Close has sufficient pitches to meet the need arising from gypsies and travellers in the borough as defined by the new national policy.

The Council will continue to safeguard the site at Willow Close and secure any new pitches that arise as a result of the Crossrail redevelopment at Willow Close. This approach will meet need defined by planning policy as well as providing culturally appropriate housing for gypsies and travellers that do not meet the new planning policy definition. The Council recognises that gypsies and travellers within the borough have established connections with local social networks and services. It is therefore important for the Local Plan to continue to address their needs.

Policy Implementation

For planning purposes, Tower Hamlets will use the government's definitions of gypsies, travellers and travelling showpeople set out in the 'Planning policy for traveller sites' March 2012 and any subsequent national guidance.

Part (1) of this policy safeguards the existing Gypsies & Travellers site within the Borough to meet gypsy and traveller need as defined by the PPTS.

Part (2) seeks to secure any new pitches that may arise as a result of the completion of Crossrail development.

Part (3) sets out criteria that the Council will use to assess proposals which involve provision for new Gypsies and Travellers site as recommended in the PPTS. This policy aims to ensure the appropriateness of potential sites for use as a gypsy and traveller site and integrate the site into its local environment. The criteria outlined above seek to ensure the suitability of the site for housing in a manner similar to conventional housing. Criteria are also used to ensure the interests of the settled community are respected.

Policy H6 Student Housing

1. The Council will support the provision of student housing in close proximity to the borough's higher education institutions and in the town centre hierarchy provided that the development:
 - a. meets an identified need;
 - b. does not compromise the supply of land for conventional homes;
 - c. provides affordable student accommodation in accordance with the London Plan and supporting guidance documents;
 - d. does not create a harmful concentration of student accommodation in the local area or cause harm to residential amenity;
 - e. does not place excessive pressure on existing social and physical infrastructure;
 - f. complies with contemporary space and amenity standards and meets the needs of students in accordance with the best practice; and
 - g. Provides 10% of student rooms which are easily adaptable for occupation by wheelchair users.

2. The net loss of student accommodation will be supported where:
 - a. it can be demonstrated that the accommodation is no longer needed because the needs of the student can be better met elsewhere; or
 - b. adequate replacement housing will be provided in accordance with Policy H6 (1) and criteria (a-e).

¹⁶ 'Concealed households' are family units or single adults living within other households, who may be regarded as potential separate households that may wish to form given appropriate opportunity.

Justification

The Council supports the provision of student accommodation due to the positive impacts it brings to the local economy, our communities and the borough's higher education provision. However the delivery of a significant sum of student housing may comprise the Council's ability to deliver other priorities including conventional housing, employment and infrastructure provision. As such the delivery of student accommodation needs to be managed in accordance with strategic need and local priorities.

There is a strategic need for student accommodation across London and that this need should be dispersed across the capital rather than concentrated in central London which is the current trend. The final report of the Mayor's Academic Forum in 2014 estimated the need for additional places in dedicated student housing in London from 2011/12 to 2025/26 at 2,500 to 3,100 per year.

The Borough delivers a significant proportion of the strategic need as identified in the Mayor's Academic Forum (Strategic planning issues for student housing in London Recommendations 2014 Paper). The Paper states that since 1999 Tower Hamlets, Camden, Southwark and Islington have consistently delivered more than 50% of London's total provision. For the period 2008 -2012, Tower Hamlets was one of the established boroughs to make greater contributions to the number of student accommodation units amongst some other London Boroughs such as Camden, Southwark and Islington. This has since slowed down due to lower demand in the recent year.

According to internal Tower Hamlets data, no additional student bed spaces were completed in the 2014/2015 monitoring period although planning permission was given during the monitoring period for 100 new student rooms. 2013/14, 693 units of student accommodation were completed. 54 student bed spaces were completed in 2012/2013 monitoring period. No student bed spaces were completed in 2011/2012 monitoring period.

In line with the Policy 3.8 of the London Plan (2015), Policy H6 seeks to ensure the supply of student housing is continued to be managed to meet identified need without compromising the delivery of other important uses, in particular conventional housing.

Policy Implementation

Part (1) of this policy sets out the suitable and appropriate locations for student housing in the borough. It relates to private student accommodation, student accommodation with an undertaking with an institute or accommodation provided by the institute. Appropriate locations are traditionally of a dense urban grain where the introduction of student housing could potentially complement the existing mix of uses and are well catered for by local services. Close proximity is defined as adjacent to the institute or within walkable distance of 10 to 15 minutes.

Part (1a) requires development to demonstrate how it meets local and strategic need.

Part (1b) requires development to demonstrate that the development:

- i) will not involve the net loss of existing conventional homes;
- ii) will not prejudice the Council's ability to meet the target of 3,828 additional self-contained homes per year; and
- iii) will not involve land identified for self-contained housing through a current planning permission or a development plan document.

Part (1c) of this policy supports the provision of affordable student housing in accordance with the London Plan. Particularly, paragraph 3.53B of the London Plan explains how the policy should be applied:

"Student accommodation should be secured as such by planning agreement or condition relating to the use of the land or to its occupation by members of specified educational

institutions. Where there is not an undertaking with a specified academic institution(s), providers should, subject to viability, deliver an element of student accommodation that is affordable for students in the context of average student incomes and rents for broadly comparable accommodation provided by London universities. Information on this will be provided through the Mayor's Academic Forum in the London Plan Annual Monitoring Reports."

Through the London Plan and Mayor's Academic Forum, the Council understands that further guidance on how such accommodation should be defined, delivered and retained may be provided in the near future.

Part 1 (d-e) and (f-g) 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 the 'studentification' (an over-concentration of student housing) of some areas which may have an impact on the amenity of existing residents. The issues are related to noise disturbance, over-crowding on public transport, or the loss of shops and services that meet the needs of longer term residents. Part (c) and (d) of the policy seek to address these concerns. Council will therefore assess proposals for student housing having regard to any existing concentrations in the area, and the wider housing mix in the community. Where the scale or concentration of student housing proposed is likely to harm the balance and sustainability of the community or otherwise harm local amenity, the Council will seek a range of mitigating measures.

Part (2) sets out criteria that the Council will use to assess 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. As such the loss of student accommodation will only be supported where it can be demonstrated that it no longer serves a purpose or can be provided elsewhere.

4. Economy and Jobs in Tower Hamlets

Introduction

Tower Hamlets has a thriving and diverse economy. The majority of businesses in the borough are small companies employing less than ten staff but at the same time some of the largest international financial and business service companies are concentrated in Canary Wharf and the City Fringe. The borough has also seen a growth in 'tech' and creative industries over the last few years, as well as businesses moving from more central areas of London to take advantage of cheaper rents. Current office employment space is concentrated around Canary Wharf and the 'City Fringe' in the western part of the borough, with the latter forming part of the Mayor of London's 'Tech City' and also includes Whitechapel which is part of 'Med City'. Around the Borough are smaller local and secondary offices, creative industries and industrial uses.

Employment space in the Borough has come under increasing development pressure though and legislative changes have broadened the scope of permitted development enabling change of use without a full planning application. Alongside this there has been a shift in the type of employment space that employers require. This pressure, along with outward-migration of businesses from more central areas, has meant that it is not just availability but also affordability of employment space that has become an issue for local businesses and start-ups.

The number of jobs in the borough is projected to increase significantly in future years – an additional 125,000 by 2031. The majority of this increase is likely to be office-based. Around 88% of the growth is expected to be focused within the Isle of Dogs and South Poplar Opportunity Area but a significant number of jobs are also expected to be delivered around the Borough, particularly the City Fringe. Therefore, supporting economic growth is a key element of the proposed vision for the Borough, and this section supports the provision of new employment space and protection of existing space to ensure that the Borough's needs are met and local people have access to a range of employment and enterprise opportunities.

The London Plan's Employment Projection (2011-36)

According to the GLA, the latest employment projection data shows that the number of jobs could grow from 285,000 to 410,000 in Tower Hamlets by 2031¹⁷. This represents an approximate 30% increase over the Local Plan period. This is by some way the largest growth figure in London, although it should be noted that jobs in the borough grew by 132,000 between 2000 and 2015 so therefore such projected growth could be considered realistic, so long as sufficient employment space is delivered to accommodate such growth.

The latest London Labour Market Projections (2016) from the GLA concludes that Tower Hamlets is one of the central London Boroughs (such as Camden, City of London and Hackney) which has areas with established employment centres reaping agglomeration economies and so is likely to continue to be attractive to employers as a place in which to locate.

Supply and Demand for Employment Sites

Offices

The Council's evidence¹⁸ has found fragmented demand in the borough. Local businesses serving a local need, which tend to operate from older and cheaper premises, are finding themselves priced out of newer stock by firms moving from more central areas of London and able to pay more. The supply of older stock is itself coming under pressure from change of use. Meanwhile, around the Isle of Dogs and City Fringe employment space achieves rents beyond the traditional 'local market'. The borough has a pipeline of office land that is capable of meeting demand in terms of total floorspace and that is

¹⁷ GLA Employment Projections, 2016: <http://data.london.gov.uk/dataset/gla-employment-projections/resource/28282ee1-5555-4524-ab43-a5df725cac43>

¹⁸ Draft Tower Hamlets Employment Land Review, 2016

deliverable, but not necessarily to meet the actual needs of especially more local businesses and those requiring more 'affordable' units.

Industrial

There has been significant loss of industrial floorspace in the borough over the previous plan period, with release of such land exceeding benchmarks. Almost no new industrial floorspace is being provided anywhere in the borough, despite a market shortage and evidence of a viable market. There is a lack of supply of industrial land to support the forecast growth in industrial jobs.

This section relates to employment uses within the 'B' use classes. While other use classes create employment these are covered by other policy sections within the Local Plan.

This section contains:

Strategic Policy EMP1 Investment & Job Creation

Strategic Policy EMP2 Employment Locations

Strategic Policy EMP3 Providing new employment space

Policy EMP4 Protecting employment

Policy EMP5 Redevelopment Within the Borough's Employment Areas

Policy EMP6 Providing Affordable Workspace

Strategic Policy EMP1: Investment and Job Creation

1. *All developments should seek to maximise and deliver investment and job creation in the borough, by:*
 - 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 job opportunities are provided throughout the borough, and particularly within designated employment locations and town centres;*
 - d. *ensuring the borough's residents have access to education and skills that will enable them to benefit from employment and enterprise opportunities; and*
 - e. *ensuring that new employment space is completed to a standard conducive to facilitate immediate occupation and minimise long-term vacancy.*

2. *All developments should promote the creation of a sustainable, diverse and balanced economy by:*
 - a. *ensuring availability of a range of workspaces and unit sizes, including 'affordable workspace', start-up space, co-working space and 'grow-on' space as part of planning applications for mixed and employment uses; and*
 - b. *working with affordable and shared workspace managers and providers to bring forward affordable and shared workspace proposals as part of development proposals.*

Justification

EMP1 (1) describes how development should contribute to meeting the Council's 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. In order to protect and maintain the borough's function at different levels and to facilitate investment

and job creation in the borough, particular areas of the borough will be designated as specific employment areas.

Part (1c) provides spatial guidance for the employment areas, for which locations, characteristics and development principles of designated areas are set out in Strategic Policy EMP2. Part (1c) also highlights that town centres are locations in which the Council supports non-retail employment uses. 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.

Part (1d) acknowledges that access to education and skills development is vital for economic development, as it attracts businesses to invest in the borough and enables local people to benefit from opportunities that emerge. The provision of facilities for education and skills development is covered within the Social and Community Facilities section.

Part (1e) seeks to promote the provision of employment spaces that meet the needs of potential occupiers. In particular it aims to protect from long-term vacancy caused by new spaces being left as shells for which start-up costs are considerable, thus deterring interest from potential tenants. Such spaces are quite often subsequently converted to other uses having never been occupied, undermining policies which aim to maintain employment space and detracting from the visual appearance of the unit's surroundings.

As supported by London Plan policy 4.10, Part (2) of EMP1 supports the provision of a range of workspaces for SMEs and microbusinesses in the borough. This will have the dual benefit of supporting new and emerging economic sectors, and providing additional space for local SMEs and micro-businesses that provide employment for a significant proportion of the population of Tower Hamlets. The policy promotes provision of flexible and shared co-working space for start-up and grow-on businesses. Development incorporating a range of unit types and sizes of small business units will be encouraged, including where these are clustered within a single building and provide shared and networking facilities. Further detail on what constitutes 'affordable' workspace provision in the borough and particular requirements for shared workspaces will be guided by the Council's Economic and Development team.

Policy Implementation

To address EMP1(1) the Council will work with applicants through 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. In particular, new units should be completed to a standard suitable for immediate occupation by potential users. For example, within office developments, this would include high-speed broadband connectivity whereas industrial units would be expected to provide double-height units with appropriate access.

EMP1 (2) acknowledges that employment demand and provision comes in different forms and models, seeking a mixture of employment space to meet different needs. Developments should address the most up-to-date requirements as part of pre-application discussions, which will be informed by the Council's emerging Growth Strategy. The Council will particularly welcome proposals which demonstrate co-operation with recognised workspace providers, for which the Council holds 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 in the long term through planning conditions.

Strategic Policy EMP2: Employment Locations

1. *Development should respect the following guidance and policies set out for the borough's employment provision, which is categorised below:*
 - a. *Preferred Office Locations (POL)*

- i. *POLs are employment areas with high concentrations of economic activity. They predominantly consist of offices, and are most suitable for buildings with large floor-plates. They have high levels of accessibility and provide, or could provide, significant numbers of jobs. They are unsuitable for housing or any other use which could undermine their function.*
 - ii. *The borough's POLs are located at:*
 - *Aldgate*
 - *Bishopsgate Road Corridor*
 - *Canary Wharf*
 - *Around Tower Gateway South*
 - *Around Tower Gateway West*
- b. *Strategic Industrial Locations (SIL)*
- i. *SILs play 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 the SIL due to potential conflict with existing and future industrial uses. The SIL should be safeguarded and intensified.*
 - ii. *The borough's SIL is located at:*
 - *Empson Street*
- c. *Local Employment Locations (LEL)*
- i. *LELs 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, SMEs and creative and digital industries.*
 - ii. *The borough's LELs are located at:*
 - *Blackwall, which provides secondary large floorplate offices, smaller units suitable for SMEs and data centres which support the needs of Canary Wharf and the City of London.*
 - *Cambridge Heath, which provides a range of office, industrial and studio workspaces meeting the needs of businesses serving a more local need, start-ups, SMEs and creative industries.*
 - *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.*
 - *Whitechapel, which provides small office spaces meeting local needs alongside a significant and growing bio-tech and life sciences sector, creative industries and growing demand from an eastwards expansion of the City.*
- d. *Local Industrial Locations (LIL)*
- i. *LILs provide important areas of light-manufacturing, light-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.*
 - ii. *The borough's existing LILs are located at:*
 - *Blackwall Trading Estate*
 - *Gillender Street*
 - *Poplar Business Park*
 - *The Highway*
 - *Thomas Road*
- e. *Designated town centres*
- i. *The borough's designated town centres provide opportunities for small-scale offices, typically located above retail units, which particularly meet the needs of businesses serving local communities. The Central Activities Zone (CAZ), Tower Hamlets Activity Areas (THAA), District town centres and larger Neighbourhood town centres also provide opportunities for purpose-built office buildings with ground-floor retail uses.*

- f. *Non-designated employment sites*
 - i. *These are sites in employment use throughout the borough, outside the designated employment areas described in parts a to d or designated town centres. They may be located either individually or as part of a small cluster. Cumulatively they provide significant floorspace and jobs across a variety of sectors.*

Justification

EMP2 (1) sets out the characteristics and development principles of the borough’s employment areas. A spatial designation helps 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. This spatial understanding enables the Council to identify and designate locations suitable for different types of employment. In applying this understanding to the location of primary and large floorplate office space, suitable areas for Preferred Office Locations include Canary Wharf and areas of the City Fringe because of the existing context, infrastructure, and concentration of activity and high levels of accessibility. There is also a particular need to identify and protect industrial land as release of such land in the borough in recent years has been higher than previously planned for, meaning that there is high demand for this type of space. Remaining clusters of industrial floorspace have been identified, at Blackwall Trading Estate and Thomas Road¹⁹, and alongside existing designated sites which would be retained under existing designations. In addition, with an increased demand for secondary office space across the borough, a number of areas have been identified as suitable locations to accommodate this demand, as they have relatively high public transport accessibility levels. These areas can support specialist sectors including the research, medical, innovation and knowledge sectors, as can be seen at Whitechapel. Broadly these proposed designations are aligned with the previous ‘Local Office Locations’, although it is proposed that these are renamed to Local Employment Locations to reflect that these areas meet employment needs other than simply as offices. A new area has been proposed under that designation at Cambridge Heath²⁰ with deletion of the existing designation at Mile End.

The previous approach of POLs, as not being appropriate locations for housing is being maintained with the GLA’s CAZ SPG (which includes the Isle of Dogs) supporting this approach, setting out that residential use is not appropriate within the ‘commercial core’. The position on safeguarding the SIL and residential use being unsuitable is maintained due to the potential for residential use to conflict with the core industrial function in the designation and potential reverse sensitivity issues.

Policy Implementation

Applicants should ensure that proposals meet the principles set out in this policy, and refer to further more detailed policies for the different employment locations that follow.

Strategic Policy EMP3: Provision of New Employment Space

1. *Development of new employment floor space will be encouraged, particularly within the designated employment areas.*
 - a. *Outside of designated employment areas, new employment space will be directed to the following locations:*
 - i. *the CAZ and Tower Hamlets Activity Areas*
 - ii. *designated town centres, subject to the requirements of TC8.1*
 - iii. *at concentrated nodal points along major routes*

¹⁹ Paragraphs 6.181 & 6.184, Draft London Borough of Tower Hamlets Employment Land Review (2016)

²⁰ Paragraph 6.130, Draft London Borough of Tower Hamlets Employment Land Review (2016)

- b. *New employment space will only be considered at other locations to those specified in part 1(a) if:*
 - i. *it can be demonstrated that there is a reasonable prospect of occupancy;*
 - ii. *the employment use would contribute towards integrated place making;*
 - iii. *the area forms part of a cluster of similar employment uses;*
 - iv. *and/or the employment space is being provided as part of a temporary use.*
 - c. *Within the Whitechapel LEL, new development should provide high-quality flexible workspace 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 SMEs and creative businesses.*
2. *Development of employment and residential use in the same self-contained unit (i.e. live-work and work-live) will not be supported.*

Justification

Policy EMP3 (1) encourages the provision of additional employment floorspace to meet demand and contribute to delivering the proposed vision for Tower Hamlets. Where new provision is proposed it must be located in the most viable locations to avoid long-term vacancy or subsequent conversion. To reduce the likelihood of this situation a spatial approach has been taken as set out in the policy. Part (1a) directs new provision firstly to locations of highest activity, accessibility and visibility, and then only to other locations if the applicant can demonstrate a reasonable prospect of occupancy (part b). Part (1c) recognises the particular demands for different types of spaces unique to the Whitechapel LEL to support its 'Med City' role alongside a growing creative sector and existing local SMEs.

It has been found that numerous permissions for live-work units have not been used for that purpose, instead being used entirely for residential use and this often not being officially consented through the planning system. Therefore it is not considered that there is a need for such accommodation and any such proposals would not be supported as articulated by EMP3 (2).

Policy Implementation

As a first priority, new employment space should be located within the designated employment areas. To facilitate employment opportunities across the borough, proposals will also be welcomed outside of the designated employment areas, particularly within the CAZ, Activity Areas, town centres and major routes (those locations with the highest level of accessibility and other commercial activity). For the purposes of EMP3(1a)(ii) major routes are considered to include the A11 (Bow Road/Mile End Road), A12, A13 (Commercial Road/East India Dock Road, A107 (Cambridge Heath Road), A1203 (The Highway), A1205 (Burdett Road/Grove Road), A1208 (Hackney Road), A1209 (Bethnal Green Road), A1261 (Aspen Way), or along other non-'A' roads if it can be demonstrated that there is a high level of footfall, accessibility and visibility.

Part (1b) of EMP3 is to safeguard from long-term vacancy, therefore proposals outside of the areas referenced in part (1a) would be expected to demonstrate through a detailed marketing strategy that the anticipated asking rents/purchase price for the space would be appropriate to the location (according with indicative figures held by the Council) 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.

Part (1c) recognises and supports the Whitechapel Vision (2015), which is to expand the Mayor of London's 'Med City' in Whitechapel Masterplan area, and that the area is increasingly valued by SMEs and creative industries moving away from the City and West End. Applicants should demonstrate that proposed employment space in that area both individually and cumulatively contributes to providing the range of spaces required.

Both Part (1b) and (1c) should be considered alongside Chapter 5: Delivering Placemaking.

Policy EMP4 Protecting Employment

1. *Development resulting in the net loss of office floor space in Preferred Office Locations (POLs) or industrial B Use Class floor space in Local Industrial Locations (LILs) and Strategic Industrial Locations (SILs) will not be supported.*
2. *Development should not result in the loss of employment floorspace outside of the designated employment areas cited in EMP1 (1a-1d).*
 - a. *Proposals for loss or reduction of employment floorspace within Local Employment Locations (LELs), within designated town centres and at non-designated employment sites must:*
 - i. *provide evidence of active marketing over a period of at least 24²¹ months at a reasonable market rent which accords with indicative figures held by the Council; or*
 - ii. *satisfy the Council 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 alternative use would be beneficial to the location.*
 - b. *Proposals for loss or reduction of employment floorspace within Local Employment Location (LELs) must also satisfy the following additional requirements :*
 - i. *alternative employment uses have been considered for the site and it can be demonstrated that these would not be viable; and*
 - ii. *the loss of employment floorspace would not compromise the operation and viability of the wider LEL.*

Justification

EMP4 (1) and (2) describe the criteria that must be addressed to consider the loss of employment space, which accords Key Objective 1 of the proposed Vision. The previous position of no loss of floorspace within the POLs, SILs and LILs is maintained. This is essential to ensure the viability of those locations for employment, and also in the case of the SILs and LILs to maintain supply of industrial land in the borough as this has come under particular pressure as the Employment Land Review (ELR), 2016 has recognised a shortage of such space, and there are strategic implications on the ability of Canary Wharf and the City of London to function as international business locations without supporting services provided from such locations.

EMP4(2a)(i) has sought to increase the previous 12 months marketing period to 24 months in order to prevent additional loss of existing employment space which has a higher demand than supply.

Emerging evidence from the London Industrial Land Supply and Economy Study (2016) indicates that the release of industrial land in London has now far exceeded the original targets envisaged in 2012. Therefore, it is considered that the Local Plan will need to put more emphasis on strengthening the protection of the existing industrial land to reflect the evidence base.

Policy Implementation

Proposals involving the loss of industrial land that are located outside the SIL or LILs will be considered on a site-by-site basis by applying policy EMP4(2).

To satisfy EMP4 (2a) (i) the applicant 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. Such information should accord with indicative guidance held by the Council and which is regularly

²¹ Paragraph 8.92, Draft London Borough of Tower Hamlets Employment Land Review (2016)

updated. It would be expected that the 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 the Council 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. It is recognised though 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.

For EMP4 (2b)(i), 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 that a B1(a) office couldn't be used for light manufacturing or research and development.

Policy EMP5 Redevelopment within the Borough's Employment Areas

1. *The redevelopment of Local Industrial Locations (LILs) to include non-employment uses will only be supported if the existing industrial B Use Class floor space 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. *separate access and servicing is provided for employment and non-employment uses;*
 - d. *employment units are completed to a standard which would facilitate immediate occupation; and*
 - e. *a range of high quality flexible working spaces are provided, meeting the needs of Small and Medium Enterprise (SMEs).*

2. *The redevelopment of Local Employment Locations (LELs) to include non-employment uses will only be supported if the existing level of employment floor space is re-provided on-site in accordance with Policy EMP2 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 high-quality flexible workspace 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 SMEs and creative businesses within the Whitechapel LEL;*
 - d. *provides a range of units to meet the needs of SMEs 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, SME space and studios to meet the needs of creative industries within the Cambridge Heath LEL.*

3. *Development which is likely to adversely impact on 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.*

Justification

EMP5(1) and (2) seeks to strike an appropriate balance between employment and other uses, particularly residential. This is to ensure that the employment function of LELs and LILs is maintained.

Policy Implementation

EMP5(2)(c-f) provide guidance as to the types of spaces that are appropriate within each LEL to maintain their function, 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.

EMP5(3) 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 themselves 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.

Policy EMP6 Providing Affordable Workspace

1. *Where employment floorspace is to be provided as part of major commercial and mixed-use schemes, 10% of the employment space provided should be affordable workspace.*
2. *Proposals for the redevelopment of existing affordable or low value employment floorspace should re-provide such floorspace at below-market rents with existing businesses given first priority for the re-provided space.*

Justification

The draft Employment Land Review has identified that rents in the borough have been rising as businesses move further east from the City. This has meant that many businesses, particularly those serving a more local market within the borough, are struggling to access employment space. High rents are also a disincentive for entrepreneurs and start-ups locating in the borough. Along with the London Plan which encourages a range of workspaces in terms of size, type and cost, it is important to ensure that affordable workspace is available within the borough. A definition of affordable workspace will be provided in the Council's emerging Growth Strategy.

Policy Implementation

To address EMP6(1), the applicant should submit evidence of agreement to lease at least 10% of the employment floorspace within the proposal, subject to viability, at less-than-market-level rent. Applicants would be encouraged to demonstrate that they are working with a recognised affordable employment space provider. If on-site provision is not possible, financial contributions for equivalent off-site provision will be sought.

To satisfy part (2), should a new occupier be sought the applicant should provide information to justify their approach which might include a statement from the existing business should their needs be better met elsewhere, or provide information as to why it would be inappropriate for the existing business to return following redevelopment.

5. Town Centres in Tower Hamlets

Introduction

Town centres form an important part of the borough's distinct identity and character, acting as anchors for local areas with a mix of uses and activities that draw our Borough's diverse communities together. The borough's town centres themselves vary in appearance, nature and scale. The proposed Vision for Tower Hamlets seeks to promote the borough's town centres and markets through strengthening their role.

As articulated within the GLA's Town Centres Supplementary Planning Guidance, town centres are increasingly being used as hubs for leisure, social and community activities in addition to shopping, and also provide significant opportunities for offices and housing. Additionally, outside of town centres there are other areas of commercial and leisure activity, local shops and individual stand-alone units which have a role in supporting the borough's needs.

In recent years changes to the General Permitted Development Order (GPDO) have enabled change of use between town centre uses. The policies within this section have been drafted to ensure that should any Article 4 directions be brought forward to remove such permitted development to respond to local conditions, an appropriate framework would be in place to properly consider any change of use applications that come forward.

The policies contained within this section are largely informed by the emerging evidence base studies the Draft Tower Hamlets Town Centre Retail Capacity Study (2016). Further guidance on individual town centres will also be provided by Town Centre Vision Strategies which will be progressed subsequent to publication of this draft Local Plan.

This section contains:

Strategic Policy TC1 The Town Centre Hierarchy
Strategic Policy TC2 Protecting and Enhancing Our Town Centres
Policy TC3 Protecting and Enhancing Retail in Our Town Centres
Policy TC4 Managing and Supporting Retail Outside Our Town Centres
Policy TC5 Financial and Professional Services
Policy TC6 Food, Drink, Entertainment and the Night-time Economy
Policy TC7 Short-stay Accommodation
Policy TC8 Offices within the Town Centre
Policy TC9 Markets

Strategic Policy TC.1: The Town Centre Hierarchy

1. *Development should support the role and function of the borough's Town Centre Hierarchy and provision of town centre uses in accordance with the principles set out in Table 1.*
2. *Development proposals are expected to respect the principles set out in Table 1 along with the specific guidance and policies set out for each layer:*
 - a. *Central Activities Zone (CAZ)*
 - i. *The continued enhancement and promotion of the CAZ including the potential for residential development on upper floors outside of the Preferred Office Locations (POL) will be supported.*

- b. **Major Centre**
- i. *The borough's Major town centre is located at Canary Wharf, which is also a key global employment centre and one of the borough's Preferred Office Locations (POL).*
 - ii. *Within the Major Centre the provision of a high proportion of comparison retail compared to convenience is encouraged, as is the provision of leisure and civic functions.*
 - iii. *The important role of Canary Wharf as the borough's major centre and an important public transport interchange will be promoted.*
 - iv. *The improvement of local accessibility to Canary Wharf will be supported.*
 - v. *The continued growth of Canary Wharf will be promoted to support future re-designation as a Metropolitan Centre.*
- c. **Tower Hamlets Activity Areas (THAA)**
- i. *A mix of uses within the THAA will be supported.*
 - ii. *Development proposals should be mixed-use schemes with active uses at ground floor level with residential or employment space on upper floors.*
 - iii. *Key anchor uses, such as supermarkets and civic uses, will only be allowed within the town centre boundaries of the Activity Areas.*
- d. **District Centres**
- i. *The borough's District town centres are at the following locations:*

<i>Bethnal Green Road</i>	<i>Roman Road West</i>
<i>Brick Lane</i>	<i>Roman Road East</i>
<i>Chrisp Street</i>	<i>Watney Market</i>
<i>Crossharbour</i>	<i>Whitechapel</i>
 - ii. *The borough's District centres will be promoted as vibrant hubs for the local community, containing a wide range of shops and services to meet the needs of local communities and attract visitors from further afield.*
 - iii. *A new civic hub for the borough will be directed to Whitechapel District centre, with further guidance on supporting infrastructure and appropriate ancillary uses provided in the Whitechapel Vision Masterplan SPD.*
- e. **Neighbourhood Centres**
- i. *The borough's Neighbourhood town centres are at the following locations:*

<i>Aberfeldy Street</i>	<i>Mile End</i>
<i>Ailsa Street</i>	<i>Poplar High St.</i>
<i>Barkantine Estate</i>	<i>Redchurch Street</i>
<i>Ben Jonson Road</i>	<i>Salmon Lane</i>
<i>Burdett Road South</i>	<i>South Quay</i>
<i>Cambridge Heath</i>	<i>Stroudley Walk</i>
<i>Columbia Road</i>	<i>Stepney Green</i>
<i>Devons Road</i>	<i>Thomas More</i>
<i>Limehouse</i>	<i>Wapping Lane</i>
<i>London City Island</i>	
 - ii. *Enhance existing Neighbourhood centres and ensure that they provide a range of shops including essential uses and social and leisure facilities to meet the needs of their local catchments.*
- f. **Neighbourhood Parades**
- i. *Designate the following as Neighbourhood Parades:*

<i>Burslem Street</i>	<i>St James's Avenue</i>
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<i>Caspian Wharf</i>	<i>St Leonards Street</i>
<i>Castalia Square</i>	<i>St Pauls Way</i>
<i>Cleveland Way</i>	<i>Westferry Road</i>
<i>Manchester Road</i>	<i>West India Dock Road/Pennyfields</i>

- ii. *Ensure that Neighbourhood Parades are protected to meet the needs of their local catchments.*
- g. *Other non-designated locations*
 - i. *The retention of existing retail uses will be supported where need remains. New retail uses will be considered only where they are of a ‘local’ scale and designated town centres would not be undermined, subject to the requirements of other policies.*

Table 1. The Town Centre Hierarchy

<p>The Town Centre Hierarchy consists of the following, with boundaries outlined on the Proposals Map:</p> <p>Central Activities Zone (CAZ) The Central Activities Zone forms London’s “vibrant centre and one of the world’s most attractive and competitive business locations”²². It contains key areas for employment, retail, leisure, culture, tourism as well as housing.</p> <p>Major Centres Major Centres are defined by the London Plan as containing over 50,000sqm of retail and leisure floorspace with a borough-wide catchment area.</p> <p>Tower Hamlets Activity Areas (THAA) The THAAs provide areas of transition between the scale, activity and character of the CAZ and Canary Wharf Major centre and their surrounding places.</p> <p>District Centres District Centres generally meet more local needs, with catchments of around 800m and provision of convenience goods and services. Typically they will contain 10,000-50,000sqm of retail, leisure and service floorspace, and may have specialist functions. They have high levels of accessibility. They are also generally suitable locations for housing and employment.</p> <p>Neighbourhood Centres Neighbourhood Centres contain clusters of retail and services to meet the needs of a more local catchment. They will typically contain at least sixteen units. Units are predominantly of a small scale, with convenience supermarkets of around 500sqm 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.</p> <p>Neighbourhood Parades Neighbourhood Parades are small clusters of convenience retail and other local services, typically containing between four and fifteen units. They tend to cater to a more immediate convenience need for surrounding residents, complementing rather than competing with the borough’s provision of retail and services further up the hierarchy. They tend not to be appropriate for leisure and night-time economy ‘destination’ uses, but may have some small-scale social provision such as community centres or community public houses.</p> <p>Other Non-designated Locations There are many existing town centre uses located outside of the CAZ, Activity Areas and designated</p>
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²² Greater London Authority <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/central-activities-zone#Stub-160725>

town centres. These might be single isolated units or within part of a cluster of commercial uses. They tend to meet a very local immediate convenience retail need, offer a niche service for which location within a higher value area is not required, or support a particular neighbouring use.

Justification

The government requires local planning authorities to define a network and hierarchy of centres which are resilient to anticipated future economic changes in the Local Plan (Paragraph 23 of the NPPF). Key Objective 1 also seeks to strengthen the role of town centres to ensure they contain a diverse mix of uses including local shops and services. The Council's previous definition of the Town Centre Hierarchy and guidelines (Core Strategy 2010²³) for each level have been taken forward, with further detail added to outline the type of development and mix of uses that are appropriate at each level.

The identification and designation of a further layer of the hierarchy has been proposed - Neighbourhood Parades. This layer is recognised within the London Plan and would help to mitigate the impact of change of use, especially to residential use, through the GPDO. This would be achieved by such a designation formalising the importance to local communities of small parades of shops meeting immediate convenience needs. This would help to justify refusal of Prior Approval notifications on the grounds of undermining shopping provision. On the basis of introducing this additional layer into the hierarchy it is proposed that the existing neighbourhood centres at Manchester Road and Westferry Road are re-designated as Neighbourhood Parades. This is because their size and character are more aligned with the definition set out for Neighbourhood Parades.²⁴

It is also proposed that five new Neighbourhood Centres are designated in the following locations: Ailsa Street, Burdett Road South, London City Island, Redchurch Street and South Quay. The designation of these new Neighbourhood Centres reflects existing mixed-use activity and/or responds to population growth. The proposal for Burdett Road South reflects existing mixed-use activity at that location along with forthcoming development within the vicinity. The proposal for South Quay reflects the aspiration within the South Quay Masterplan to create a 'high street' environment along Marsh Wall; with the anticipated level of population growth coming forward in that area there would be a need for convenience retail and other local services to meet immediate convenience needs. Such provision would complement rather than compete with the adjacent Major town centre at Canary Wharf. The proposal for a Neighbourhood centre at London City Island reflects the level of development coming forward in that part of the borough and it being relatively isolated from existing services. Similarly, a designation for Ailsa Street would recognise the need for shops and services in that location to support future development potential given its comparative detachment from existing centres.

The aspiration within the London Plan to re-designate Canary Wharf as a Metropolitan Centre has been recognised. These policies set guidelines to help facilitate and support such re-designation. Whitechapel is a District Centre however the opening of Crossrail in 21019 may see it develop potential to be redesigned as a Major Centre before the end of the Local Plan period. Such growth in Whitechapel to enable re-designation would include delivery of a new Civic Hub, a further increase in employment space and increased retail space with a relatively high proportion of comparison goods relative to convenience goods. The Annual Monitoring Report (AMR) will monitor the development of the town centre and will identify the need for the policy to be reviewed closer to this time if appropriate.

²³ See LBTH Retail & Leisure Capacity Study, Roger Tym & Partners (2009)

²⁴ Paragraphs 22.86-22.88, Draft Town Centre Retail Capacity Study (2016)

Policy Implementation

Applicants would be expected to demonstrate that proposals accord with the guidelines set out through this policy for each level of the town centre hierarchy as appropriate, as well as any place-based guidance elsewhere within the document. This could include providing assessments of the mix of uses within the town centre as a whole or within a reasonable radius where outside of designated centres, outlining how the proposed use would contribute to the area's function and that it positively enhances the town centres viability and vitality.

Within the CAZ, applicants should primarily refer to London Plan policy and the CAZ Supplementary Planning Guidance (2016) (SPG). In line with the London Plan and its SPG, residential use is considered not appropriate within the Preferred Office Locations (POL), as this has the potential to undermine the commercial function of those areas where the POL also applies.

Within and around the Canary Wharf Major centre, new development will be expected to demonstrate that it maximises the potential to enhance movement and connectivity to and through the area, in particular improving links between Canary Wharf and surrounding areas to the north and south.

Anchor uses are considered to be larger units that have particular attraction, drawing custom in from a wider area than may otherwise be the case for town centres or commercial clusters of similar size. The presence of such an 'anchor' also benefits the wider town centre and the uses within. For the purposes of TC1.3c, 'anchor use' refers to proposals above 700sqm. This is, for example, larger than typical convenience-format supermarkets.

Where change of use is proposed within Neighbourhood centres and Neighbourhood Parades, applicants should demonstrate through an assessment that the remaining 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.

Strategic Policy TC2 Protecting and Enhancing Our Town Centres

1. *Development contributing to the delivery of new retail and leisure floorspace within designated Major, District and Neighbourhood town centres to meet identified demand will be supported.*
2. *Development should contribute positively to the function and viability of the borough's designated Major and District town centres in accordance with defined primary and secondary frontages on the Proposals Map.*
 - a. **Primary Frontages** define the primary shopping areas of the borough's Major and District centres.
 - i. *Proposals that contribute to achieving 60% of units within the primary frontages to be within A1 retail use will be encouraged.*
 - ii. *The primary frontages are also suitable locations for non-A1 retail uses that contribute to the vitality of the town centre including cafés, restaurants, and drinking establishments.*
 - iii. *Hot food takeaways, betting shops and payday loan shops are not considered suitable uses in the primary frontage.*
 - b. **Secondary Frontages** define locations within the designated Major and District town centres which provide opportunities for a greater diversity of uses including non-retail uses which support the overall function of the town centre.
 - i. *Within the secondary frontages the proportion of ground floor units within A1 retail use should not fall below 40%.*
 - c. *Non-designated frontages within designated Major and District town centres, are more peripheral locations within the town centre, here there is no minimum*

threshold for A1 retail use. Proposals for financial and professional services (A2), employment uses ('B' use classes) and community uses will be particularly supported in these locations.

- d. *Within the borough's Neighbourhood Centres and Neighbourhood Parades there are no designated frontages, but to ensure sufficient provision of local services the proportion of units within A1 retail use should not fall below 40% of all units within the designated centre.*
3. *The scale and type of uses within town centres should be consistent with the hierarchy, scale and role of each town centre. This will be achieved by:*
 - a. *Ensuring town centres are active, well-used and safe during day and night through appropriate uses, good design and high quality public realm;*
 - b. *Encouraging evening and night time economy uses that contribute to vibrancy, inclusiveness, economic vitality and viability and complements existing activities;*
 - 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 communities;*
 - d. *Facilitating the cultural and leisure sector in our town centres by supporting multifunctional, diverse and inclusive venues and promoting associated uses; and*
 - e. *Promoting and focusing street markets in town centres by supporting their growth and recognising their role in adding retail variety, promoting local enterprise and contributing to local character.*

Justification

In line with the NPPF, the Council has sought to define and designate primary and secondary frontages within the Major and District town centres. This better allows identification of the primary shopping areas within those town centres to facilitate policies which support the vitality and viability of the town centres.

It is proposed that 60% of units within the primary frontages and 40% of units within secondary frontages should be within A1 retail use. This helps to maintain a concentration of retail (A1) to act as the dominant use and core function of the town centre, and to reinforce its overall vitality and viability. These areas of the town centres will have the highest levels of activity and footfall; therefore 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 and to improve the health and wellbeing of local people. These would be considered to include cafés, restaurants, drinking establishments, banks and building societies. Other uses would be appropriate on upper floors within the primary frontages.

Within the secondary frontages, a wider mix of uses is supported therefore a lower minimum threshold for A1 retail use is appropriate. Although these areas do not form part of the primary shopping areas they do still contribute to the overall vitality and viability of the town centre offer. Therefore, it would not be appropriate for 'clusters' of uses with negative impacts on health and wellbeing of the town centre, to form in these or any other locations.

Where there are undesignated frontages within the Major and District town centres, these are areas that contribute to the overall offer of the town centre but have more tertiary (such as small offices, wholesalers, and storage) or community functions with little if any retail use.

A minimum proportion of 40% of units within Neighbourhood Centres and Neighbourhood Parades to be within A1 retail use has been put forward for consistency with the secondary frontages of larger centres.

To support TC2(2) the Council undertook an assessment of retail and leisure floorspace needs for the borough's designated town centres²⁵. This identified a cumulative need for 2,033sqm of convenience

²⁵ Draft Tower Hamlets Town Centre Retail Capacity Study (2016)

retail floorspace and 1,963sqm of comparison retail floorspace across the borough's neighbourhood town centres. For the Major and District centres, a need was identified for 4,061sqm convenience retail and 4,627sqm of comparison retail. A total of eight additional cinema screens are required in the borough across the plan period.

The Council's evidence for the previous Local Plan highlighted that the design, accessibility and layout of town centres has an important impact upon their success, and in turn the health and wellbeing of local people. Therefore it is proposed that previous Core Strategy policy SP01 (2) is largely retained as TC2 (3). In particular, part (c) is important in ensuring that town centres offer a range of unit sizes and types to meet the needs of different occupants.

Policy Implementation

Developments should utilise the most recent information available to justify that proposals for change of use from A1 use within the primary and secondary frontages would accord with the minimum percentage figures set out by TC2(1). The type of use proposed within primary and secondary frontages should accord with the guidelines for appropriate uses within those areas. The Council will monitor the mix of uses within the borough's designated town centres on an annual basis as part of the Council's Annual Monitoring Report (AMR). A monitoring framework is included in chapter 6 of the Local Plan.

Developments proposing additional retail floorspace will be particularly welcomed where they contribute towards the figures outlined in TC2(2). Where new retail or leisure floorspace is proposed beyond those figures, the applicant would be expected to demonstrate that a demand does exist for such floorspace and that it would not detrimentally harm the viability of existing floorspace and nearby town centres.

To satisfy part c of TC2(3), applicants would need to demonstrate that development proposals would not lead to an over-supply of particular unit types by demonstrating that there is a range of unit types across the wider town centre, and that there is a need for the type of unit being proposed.

TC3 Protecting and Enhancing Retail in Our Town Centres

1. The vitality and viability of the borough's designated town centres and the primary and secondary frontages within them will be promoted by:
 - a. protecting A1 units, unless it can be demonstrated that:
 - i. the loss of A1 units would not result in the overall level of A1 units falling below the proportions set out within TC2.1; and
 - ii. 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 over that period at an appropriate rent (providing three comparable shop unit rents within the town centre).
 - b. protecting A1 floorspace by:
 - i. resisting proposals that would result in the reduction of retail trading floorspace within primary frontages; and
 - ii. requiring robust demonstration that appropriate width and depth of floorspace would remain for town centre uses, and that the existing level of floorspace genuinely cannot be maintained where reduction of floorspace is proposed elsewhere within designated town centres

Justification

Previous evidence requirements for the loss of retail units have largely been retained through TC 3 (1). This is to ensure that proposals for change of use can be properly considered, especially if the Council brings forward Article 4 directions removing Permitted Development enabling change of use

to other retail and commercial uses. To maintain the integrity of the identified primary frontages as primary shopping areas a higher minimum proportion of A1 retail has been applied in those areas compared to the previous 50% figure (60% is proposed). Within the secondary frontages it is proposed that the minimum proportion of units to be A1 retail is reduced to 40% of all units which recognises the more mixed-use nature of such areas. Although the Council acknowledges that the changing nature of town centres and consumer demands can mean less need and demand for retail space in some locations, it should be demonstrated that continued A1 retail use is genuinely unviable therefore previous evidence requirements where the loss of A1 retail is proposed have been maintained.

Concern was raised during public consultation regarding the viability of town centres through shrinkage of existing units. Previous policy referred only to loss of units rather than reduction in floorspace, therefore it is proposed that policy is brought forward to also make sure that any negative impact on the town centre from shrinkage is properly assessed.

It is acknowledged that the Council's ability to manage change of use from A1 retail is compromised by the General Permitted Development Order; therefore the Council will explore the feasibility of implementing Article 4 directions within town centre locations to ensure that appropriate levels of A1 retail can be maintained and proposals for change of use properly assessed.

Policy Implementation

For the purposes of this policy, the loss of A1 refers to loss of units as well as any reduction in floorspace.

The Council will monitor the mix of uses within the borough's designated town centres on an annual basis as part of the Council's Annual Monitoring Report (AMR). As part of the development management process developments may wish to conduct similar studies themselves to justify that proposals for change of use would not result in the proportions of A1 units within the primary and secondary frontages falling below the proportions set out.

To satisfy TC3 (1a) (iii), the applicant 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. Such information should accord with indicative guidance held by the Council and which is regularly updated. It would be expected that the site has been actively marketed including appearing on national commercial and retail property websites.

To satisfy TC3(3b), the applicant would be expected to provide information detailing examples of other retail units of similar proposed size and layout, that those units 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.

TC4 Managing and Supporting Retail Outside Our Town Centres

1. *Proposals for new A1 retail in non-designated locations will only be supported where:*
 - a. *there is demonstrable local need that cannot be met within an existing designated centre;*
 - b. *individual units proposed do not exceed 200sqm;*
 - c. *they do not affect amenity or detract from the character of the area; and*
 - d. *they do not undermine the role of nearby town centres*

2. *Proposals for the loss of A1 shops outside of the town centre hierarchy will only be supported where:*
 - a. *the shop is within a 300m 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 3 comparable shop unit rents within the vicinity);*
- c. *the site is unsuitable for continued retail use due to its accessibility, size or condition; and*
- d. *there is no viable prospect of a retail use on the site taking into consideration projected residential growth in the vicinity and future need for provision of local shops as part of a sustainable neighbourhood.*

Justification

This policy recognises that demand exists in locations outside of the CAZ, Activity Areas and designated town centres for retail provision, for example to meet the immediate convenience needs of local people. It is also acknowledged that in the past commercial units have been delivered in areas of low footfall with lack of exposure to passing trade. These have remained vacant for prolonged periods and/or subsequently been converted to other uses. This policy, coupled with a demonstration of need for new retail provision TC4(1a) seeks to ensure that there is a realistic chance of occupancy, which will help to improve visual amenity by avoiding long-term vacancy.

Size limits on retail units outside of town centres set out in 4(1b) have been defined to ensure that uses such as larger convenience supermarkets only come forward within town centre boundaries to ensure that town centres are not undermined by nearby development. Such a ‘town centre first’ approach is set out in the NPPF.

Part(2) seeks to ensure that the borough’s supply of retail provision that meets the immediate convenience needs of local people is maintained, and that loss of retail space outside of the town centre hierarchy is properly and robustly justifiable.

Policy Implementation

To satisfy TC4(1), the applicant will be expected to demonstrate that it is appropriate for retail provision to be coming forward in a non-designated location, for example demonstrating how development proposals will support the function of a designated employment area or other local facilities. Where in proximity to a designated town centre, Activity Area or CAZ, the applicant should demonstrate that there is a lack of capacity within the designated areas (for example providing information on any vacant units within nearby designated town centres) or that it is sufficiently remote from existing designated areas so as not to be undermining them.

To satisfy TC2(2a), the applicant should outline where and how marketing has been undertaken, with details also be provided to demonstrate that the asking rent has been at a realistic rate. Such information should accord with indicative guidance held by the Council and which is regularly updated. The Council will expect that the site has been actively marketed including appearing on national commercial and retail property websites. It is recognised that in some cases requiring 12 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 retail space as part of redevelopment would not be viable at the location.

TC5 Financial and Professional Services

1. *Proposals for new banks, estate agencies and other financial/professional services within the A2 use class will be supported within the CAZ, Activity Areas, within secondary and undesignated frontages of Major and District town centres, Neighbourhood Centres, and*

Neighbourhood Parades. Outside of designated areas, A2 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 CAZ, Activity Areas and secondary frontages of Major and District Centres providing there would not be a clustering of similar businesses.*

Justification

TC5(1) manages proposals for uses within the A2 use class. Such uses are appropriate both inside and outside of town centres, although in out-of-town-centre locations adequate information must be submitted to demonstrate there is a reasonable chance of occupancy. Concern has been raised about over-concentrations of uses including estate agencies with designated town centres, therefore by managing and directing A2 uses within Major and District town centres to secondary frontages it can be ensured that the vitality of those town centres can be maintained.

Concern has been raised that payday loan shops target communities with pre-existing social deprivation and debt problems. Therefore they are directed to areas with higher levels of commercial activity so as to limit more immediate proximity to residential neighbourhoods than may be the case with Neighbourhood Centres or Neighbourhood Parades. Proliferations of such businesses also negatively impact town centre vitality and viability, therefore they are not considered appropriate within the primary frontages and proposals will be refused where there are existing concentrations.

Policy Implementation

To safeguard from long-term vacancy, development proposals in non-designated areas would be expected to demonstrate through a detailed marketing strategy that the anticipated asking rents/purchase price for the space would be appropriate to the location (according with indicative figures held by the Council) or that an occupier for the space has been secured).

To satisfy TC5(2), applicants proposing new payday loan shops should submit details of other businesses within the designated town centre (or within a radius of 400m where located within the Activity Areas or CAZ) and where such businesses are located in relation to the proposed site, to demonstrate that the proposal would not give rise to a clustering.

TC6 Food, Drink, Entertainment and the Night-time Economy

1. *Cafés, restaurants and drinking establishments (use classes A3 and A4) will be directed to the CAZ, Major Centre, Activity Areas and designated District and Neighbourhood town centres provided that:*
 - a. *it would not result in an over-concentration of similar uses; and*
 - b. *it can be demonstrated that the overall vitality of the town centre would be enhanced and the proposal positively contributes to place-making objectives.*
2. *Proposals for cafés/ restaurants and drinking establishments (Use classes A3 and A4) in Neighbourhood Parades and non-designated locations will only be considered provided that they meet the following criteria:*
 - a. *Cafés and restaurants (A3 uses) will only be permitted where:*
 - i. *the applicant can demonstrate the proposal would enhance its surroundings and/or support surrounding uses; and*
 - ii. *the applicant can demonstrate that the proposal would not undermine nearby town centres, or form part of a concentration of uses that would cumulatively cause harm to the viability of the borough's other town centres;*
 - b. *Drinking establishments (A4 uses) will only be permitted where:*
 - i. *the proposal is local in nature and scale; and*

- ii. *they would not cause harm to the amenity of surrounding properties.*
- 3. *New hot food takeaways (use class A5) will only be considered within the CAZ, Activity Areas, secondary frontages of Major and District town centres, Neighbourhood Centres or Neighbourhood Parades, subject to the following conditions:*
 - 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 town centres;*
 - c. *Within Neighbourhood Parades there would be no more than one A5 unit;*
 - d. *the proposal is not within 200m walking distance from an existing (or proposed) school and/or local authority leisure centre;*
 - e. *a Health Impact Assessment has been provided which has satisfied the Council's Public Health department; and*
 - f. *the proposal will not harm the amenity of surrounding properties.*
- 4. *New entertainment venues within the D2 or Sui Generis Use Classes (including cinemas, concert halls, theatres and night clubs but excluding betting offices/shops, amusement centres, casinos and lap dancing clubs) will be:*
 - a. *directed to the CAZ, Activity Areas and designated town centres except Neighbourhood Parades where they are compatible with other uses within the town centre; and*
 - b. *only consented 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;*
 - iii. *existing venues in designated town centres would not be undermined; and*
 - iv. *the proposal would not result in an over-concentration or clustering of similar uses.*
- 5. *New betting offices/shops will only be considered in the CAZ, Activity Areas or secondary frontages within Major and District Centres; new amusement centres, casinos and lap dancing clubs will only be considered in the CAZ, Activity Areas or Major Centre. Such uses will be resisted where:*
 - a. *there is a clustering 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 facility;*
 - c. *the proposal would detrimentally impact the character of the area; and*
 - d. *the proposal would cause unacceptable harm to the amenity of nearby properties.*

Justification

As the nature of town centres has changed, moving towards places that people visit for leisure rather than just for shopping. Demand for cafés, restaurants and drinking establishments as places to meet and socialise has increased. 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.

An overconcentration of any use can harm the viability of town centres. Therefore, while policies on the location of A3 and A4 uses are more flexible compared to the previous Local Plan it remains important to ensure that a good mix of uses remains within the borough's town centres. TC6(1b) gives the potential for clusters of such uses to develop where there are positive benefits, subject to there being no detracting to the amenity of surrounding properties.

TC6(2) recognises that in some instances it may be appropriate and desirable for A3 and A4 uses to be located outside of designated town centres, Tower Hamlets Activity Areas and the CAZ, though robust justification must be provided. Examples might include facilities that enhance the enjoyment of open spaces and water spaces, that serve transport interchanges, or that serve out-of-town-centre employment areas. Part (2b) aims primarily at the provision of new or replacement pub, noting that it is not currently policy compliant to locate a new facility in an out-of-town-centre location where an existing pub may have been lost to redevelopment.

There has been much concern about the proliferation of hot food takeaways in some town centres and this was a frequent topic arising during public consultation. Recent town centre surveys have identified high numbers of hot food takeaways in some locations, including clustering of takeaways in certain locations. Evidence from the Council's Public Health department reports that Tower Hamlets has the second highest number of "junk food outlets" per secondary school in London. While it is acknowledged that fast food can be enjoyed as part of an overall healthy diet and that these establishments can provide a meeting place, it is considered that an over-concentration of such uses can harm the desirability and viability of town centres as places to visit. Therefore where new hot food takeaways are proposed, part (3a) requires an appropriate separation from other hot food takeaways. Thresholds have also been set for town centres of different scales to protect from over-concentration. Introduction of a distance requirement for new hot food takeaway uses from schools and leisure centres (part d) seeks to promote healthy lifestyles and help protect young people from obesity. The requirement for a Health Impact Assessment to be provided will help to ensure that negative impacts on health from such uses are minimised or avoided.

TC6(3) introduces guidance for entertainment venues including the potential for them to be located outside of town centres providing strict criteria are satisfied. This recognises that there may be circumstances in which such uses outside of town centres would be preferable due to the impact on surrounding amenity through noise or the negative impact on town centre appearance created by inactive frontages or requirements for space.

Due to changes in the Use Class Order, new policies on betting shops has been introduced in TC.6 (4), which aims to restrict proposals to larger town centres and areas of high levels of commercial activities, and seeks to protect from over-concentration. This guidance also applies to other businesses that facilitate gambling as a primary function. Protecting from over-concentration is important, because just as for hot food takeaways, such uses can negatively impact the vitality of town centres and have negative impacts on public health and wellbeing.

Policy Implementation

Within the primary frontages of the Major and District Centres, 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 the applicant should provide a town centre survey outlining that an appropriate level of A1 retail is being maintained to ensure the viability of the area as the primary shopping area. Within secondary frontages in the Major and District 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 CAZ and Activity Areas applications for new A3 and A4 uses will be managed on a case-by-case basis, with the onus on applicants to demonstrate that there would not be an over-concentration of similar uses within the surrounding area.

As Neighbourhood Parades and other non-designated locations tend to be more local in character, proposals in such areas 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, and examples of why such uses might be appropriate would include supporting a designated employment area, serving a key transport interchange or enhancing enjoyment of open space. Details of any other cafés, restaurants or drinking establishments in the local area should also be provided. Where it is a drinking establishment that is proposed (A4), a detailed management plan should be submitted satisfying the Council that it is to be run as a 'community' public house that could feasibly be nominated as an Asset of Community Value and/or

be run according to the principles of the Micro-pub and Microbrewery Association and that conflicts with neighbouring properties would be avoided. Details of existing venues within the local area should also be provided to satisfy the Council that unmet need exists in the local area. Applicants would also be encouraged to consider the Council's Statement of Licensing Policy.

To satisfy TC6(3), applicants should provide information including town centre surveys in order to ensure that any provision of new hot food takeaways would not exceed the levels set out. Applicants should agree the scope and methodology of the Health Impact Assessment with the Council's Public Health department and complete the assessment in advance of submitting an application.

To satisfy TC6(), 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. For the purposes of part (ii) of TC6 (5) 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.

TC7 Short-stay Accommodation

1. *Development of visitor accommodation will be supported in locations within the CAZ, Major Centre, Activity Areas, District Centres, along primary routes or adjacent to DLR/railway/underground stations providing:*
 - a. *the size, scale and nature of the proposal is proportionate to its location;*
 - b. *the applicant can demonstrate a need for such accommodation, taking account of other proposals and unimplemented consents in the local area;*
 - c. *it does not compromise the supply of land for new homes and the Council's ability to meet its housing 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) and will be managed appropriately as short-term accommodation (up to 90 days).*

Justification

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. With its location in relative proximity to the City and West End, the ExCeL Centre, London City Airport, Greenwich, Stratford and the Olympic Park, as well as key employment locations and tourist attractions within the borough itself, Tower Hamlets has an important role to play in supporting London's visitor economy through the provision of short stay accommodation. Such accommodation also provides opportunities for local employment, supports local businesses and attracts people to the borough that may not otherwise have visited the area. However, provision of such accommodation must be sustainable in order to ensure there are no negative impacts on local people and that there is need for such accommodation. Part (1) of this policy therefore sets guidelines to manage the provision of new visitor accommodation, seeking to direct applicants to locations that are most accessible and suitable to attract visitors, and at an appropriate scale, so as to not cause unacceptable impacts on the site's surroundings and local infrastructure.

Part (d) of this policy notes the need for a flexible approach to consideration of proposals for 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.

Policy Implementation

For the purposes of TC7(1) major routes are considered to include the A11 (Bow Road/Mile End Road), A12, A13 (Commercial Road/East India Dock Road), A107 (Cambridge Heath Road), A1203 (The Highway), A1205 (Burdett Road/Grove Road), A1208 (Hackney Road), A1209 (Bethnal Green Road), and A1261 (Aspen Way).

Development of short stay accommodation should be of a size that reflects its surrounding built environment and reflect the function of their locations where located 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 Centres.

To satisfy TC(7)(1d), applicants should submit information detailing how customers would be likely access the accommodation, for example whether this would be mostly utilising existing public transport provision and if not that 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. Development proposals should be assessed alongside policy TRN2.

For serviced apartments, in order to comply with part TC7(2), 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; and
- that management will have access to the room

TC8 Offices within the Town Centre

1. *Provision of employment spaces ('B' use classes) within designated town centres will be encouraged on upper floors within the primary and secondary frontages but must accord with the policies set out in EMP1, EMP2, EMP3, EMP4 and EMP5. Where employment space is proposed at ground floor level, it should be located outside of primary and secondary frontages, to provide active frontages and accord with TC3.*

Justification

Employment uses within town centres help to ensure activity throughout the day, and directly support other businesses as part of a town centre ecosystem. They are particularly supported on upper floors in order to maintain provision of 'A' use class units and other town centre uses at street level. However, where proposed at ground floor level active frontages should be provided. Such uses at ground floor level will not be supported where there is an overconcentration at the expense of other town centre uses.

Policy Implementation

For the purposes of this policy, employment use relates to 'B' use classes.

For the purposes of providing active frontages, applicants would be expected to demonstrate that shopfronts are designed to help enhance the character and appearance of their surroundings, and those windows within shopfronts are not obscured so as to allow passing pedestrians to see inside the premises.

TC9 Markets

1. *The retention of the borough's street markets will be supported.*
 - a. *Development proposals impacting existing street markets will be supported where they:*
 - i. *demonstrate that the overall quality of the market and public realm will be improved; and,*
 - ii. *they protect or re-provide appropriate storage and servicing facilities.*
 - b. *Proposals for new markets, including farmers markets and 'streetfood' markets, will be encouraged. They will be directed to town centres and should enhance the centre's existing offer and contribute to vitality.*
 - c. *Proposals for markets outside of town centres will only be supported where they:*
 - i. *are temporary in nature;*
 - ii. *bring vacant sites back into use;*
 - iii. *do not undermine the borough's existing markets and town centres; and*
 - iv. *do not cause unreasonable harm to the amenity of surrounding properties particularly where evening and night-time markets are proposed*

Justification

The NPPF and London Plan, as well as other research and reports on town centre vitality, recognise markets as magnets to create interest and draw people into town centres. They can also act as vital incubation space for new ideas and SMEs. This policy aims to protect existing markets, in particular where they may be impacted by development proposals by for example ensuring that storage facilities are maintained.

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 disused and vacant spaces.

Policy Implementation

To satisfy TC9(1), applicants should work with the Council's Markets team through the development management process at the earliest opportunity so that required information can be provided through submitted plans to show that sufficient space is to be safeguarded to meet the needs of traders in terms of servicing and storage.

To satisfy TC9(1c), applicants should submit information detailing how the types of goods and services proposed would complement rather than compete with surrounding town centres. For parts (1b) and (1c), they should also provide a written management and design strategy which outlines how the proposal will avoid causing negative impacts on markets, such as congestion on footpaths and roads, litter and poor refuse storage and noise. In addition, when considering proposals for activating disused and vacant spaces, 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 residential.

6. Community, Culture and Social Facilities

Tower Hamlets has a range of health, leisure, social and community facilities providing valuable services to both local communities and visitors from further afield. These range from small community centres and public houses serving local neighbourhoods to regionally-significant facilities such as the Royal London Hospital and cultural venues such as Whitechapel Gallery. The borough's universities attract students from across the world.

Community and cultural facilities, and the provision of essential social infrastructure such as schools and medical facilities, play a vital role in creating and sustaining liveable neighbourhoods. Facilities such as community halls, pubs and social clubs provide opportunities for people to meet and mix together, and for cultural, sports and recreational activities to take place. Provision of a good range of educational facilities including provision for adult, further and higher education enables local people to access a broad range of employment and enterprise opportunities.

However, the borough's increasing population and housing targets place a strain on the capacity of existing community facilities. At the same time, development pressure and high land values in areas including Tower Hamlets make alternative use, particularly residential, attractive for landowners. This has resulted in valued facilities being lost.

Therefore, these policies will seek to promote and facilitate through new development delivery of essential community infrastructure in line with the Council's most recent Infrastructure Delivery Plan. In particular, 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 within chapter five of the Local Plan. Also, these policies will ensure that existing facilities are protected where a need remains. This section contains:

Strategic Policy CSF1: Supporting Community, Cultural and Social Facilities

Strategic Policy CSF2: Safeguarding Community Facilities

Policy CSF3: Pre-School Provision

Policy CSF4: Schools and Lifelong Learning

Policy CSF5: Health & Medical Facilities

Policy CSF6: Sports and Leisure

Policy CSF7: Community Centres and Places of Worship

Policy CSF8: Cultural Facilities

Policy CSF9: Public Houses

Strategic Policy CSF1: Supporting Community, Cultural and Social Facilities

- 1. Development will be expected to contribute positively to maintaining and expanding existing and delivering new community, cultural and social facilities throughout the borough*
- 2. Community, cultural and social facilities will be directed to accessible locations within the Town Centre Hierarchy, except in the circumstances outlined in policy implementation for policies CSF1, 2, 3, 4, 5, 6 and 7*

Justification

The borough's rapid population growth coupled with a high housing target set out in the current London Plan has generated increased need for community, cultural and social facilities²⁶, but also put pressure on existing the facilities. Pressure on the borough's existing facilities has taken two forms – some are at or near capacity, whereas others have come under pressure from competing higher-value

²⁶ LBTH Infrastructure delivery Plan, 2016

landuses. The aim of this strategic policy is to reduce this pressure by not allowing unnecessary loss of community facilities and seeking new facilities as part of development. It also aims to ensure that new facilities are located in areas of greatest accessibility for their catchments.

Policy Implementation

In delivering part (1) of this policy support will be given to the provision of shared services, where appropriate.

Part (1) of the policy needs to be applied in accordance with planning contributions policy within the Local Plan. As well as on site provision, developments should help the Council to ensure delivery mechanisms are in place to secure financial contributions, via a Section 106 agreement, towards the anticipated costs of site specific infrastructure which would be required to make a development acceptable in accordance with the Tower Hamlets Planning Obligations SPD. The required infrastructure and/or improvement measures should not be in conflict with the Council's Regulation 123 List.

Part (2) of the policy needs to be applied together with the Strategic Policy TC1 of the Local Plan. There are certain uses and circumstances where alternative locations may be more suitable, for example where the facility is very local in scale, with a small catchment area or where it would result in a large inactive frontage. These are explained in more detail in the following policies CSF2-7.

Strategic Policy CSF2: Safeguarding Community Facilities

1. *Development proposals should retain any existing community, cultural or social facilities onsite.*
2. *If it can be robustly demonstrated that there is no longer a need for the specific facility, the Council requires the site to be used for the following uses (in order of preference):*
 - a. *another community use, unless it can be robustly demonstrated there is no longer a need; then*
 - b. *affordable housing.*
3. *Where development proposals are likely to adversely impact on existing community facilities, the re-provision of the existing facility will be required on-site as part of the redevelopment unless it can be demonstrated that a new off-site location would better meet the needs of existing users.*

Justification

The policy provides further details and guidance to the strategic policy CSF1. Community facilities enable the delivery of key services, as well as creating spaces for socialising and community life; contributing to the liveability of neighbourhoods. However these uses are facing increasing development pressure from other land uses, primarily housing. Therefore, policies will seek to protect existing facilities where there remains a need.

Policy Implementation

CSF2 seeks to ensure that there are adequate community facilities to support the current and future residents, by resisting any loss of needed facilities. Depending on the scale and nature of the scheme, evidence to demonstrate a lack of need could include:

- an up to date Council or Public Sector Partner Strategy;
- statements from relevant providers that the existing or alternative community uses would not be possible in the premises;
- a marketing exercise at an appropriate rent over a period of at least one year; or

- evidence that the facility is no longer required in the local areas and/or a business plan that the current use is not commercially viable.

Given the Council's preference for alternative community uses on the site, applicants are expected to evidence that they have tested the potential for these uses. The Council may also request additional information where appropriate. Where it is successfully demonstrated that no community facility can be delivered from the site, the Council's preferred new use, due to the high level of local need, will be affordable housing, subject to site and viability constraints. See policy H2 for more details regarding affordable housing requirements.

It is recognised that in certain circumstances site redevelopment will require the relocation of existing uses. Through applying Part (2), the Council seeks to ensure that there is no unacceptable disadvantage to existing users, in terms of access (where relevant, within the catchment area) and that the quality and quantity of such facilities is improved. Where it is considered that a new off-site location would better meet the needs of existing users, this new facility should be provided before the new development is completed.

A number of different types of use can constitute community assets and be nominated/designated as Assets of Community Value (ACV) under the Localism Act 2011. However, the following examples provide a guide as to the types of facility or provision considered as Community Facilities, under specific categories, for both Parts 1 and Parts 2 of this policy:

For the purposes of CSF1(2) the following is a non-exhaustive guide as to the types of facility that would be considered to be suitable alternative provision to the current/most recent use:

Within the D1 use class:

- Community and social facilities such as community centres/halls, Idea Stores/libraries, places of worship and sports/social clubs
- Early Years provision such as children's centres, crèches, nurseries and pre-schools
- Education provision such as adult education, colleges, primary, secondary and special schools, training providers and universities
- Medical facilities such as acute and mental health in-patient facilities, community health facilities, primary care facilities (e.g. health centres and GP Surgeries) and specialist health services e.g. sexual health clinic

Within the D2 use class:

- Sports provision such as gyms, leisure centres, sports pitches/courts/halls/studios and swimming pools, cinemas, music and concert halls, bingo and dance halls

Within the A4 use class:

- Public houses

Within the Sui Generis use class:

- Theatres, nightclubs, launderettes

CSF3: Pre-school Provision

1. *The Council will support the provision of appropriate facilities in suitable locations that supports children's development at the Early Years stage, such as Children's Centres, nurseries, pre-schools and 'wraparound' childcare, especially where it supports the Council's statutory duty to provide childcare to some 2 year olds and all 3-4 year olds*

Justification

The policy provides further details and guidance to the strategic policy CSF1. Early Year's Facilities deliver services which both contribute towards reducing the borough's current below-average levels

of achieving good cognitive development at age 5²⁷ and enable greater employment rates amongst parents. Reflecting the importance of childcare, one of the 2015 Community Plan actions is to improve the local childcare offer. In addition, the Council now has a statutory obligation to ensure the provision of 15 hours a week of free day-care for deprived 2 year olds, and all 3 and 4 year olds. From September 2017 this obligation will increase to 30 hours per week for all 3 and 4 year olds. There is a shortfall of places²⁸.

Policy Implementation

CSF3(1) seeks to encourage the further provision of Early Year's Provision, recognising the range of provision required and offered. Facilities will be encouraged in a range of locations, recognising that nurseries often serve very local catchment areas. In order to ensure they are suitably located, applicants should outline their proposed catchment area and assess the impact of people arriving and leaving the facility and impact on the highway network and parking facilities. Depending on the proposed catchment area and highways and parking impact, suitable locations could include the ground floor of residential blocks or secondary frontages in Neighbourhood and Town Centres. Facilities will have to meet the space provision within the Department for Education guidance, Early Year's Foundation Stage.

CSF4: Schools and Lifelong Learning

1. *Development for new primary and secondary schools will be supported in locations where they are accessible to residents of their catchment areas and can demonstrate that appropriate learning spaces, including external playspace can be provided*
2. *The expansion of existing primary and secondary schools, will be supported where:*
 - a. *a need has been demonstrated;*
 - b. *the design and layout take into account the relevant guidance; and*
 - c. *play space provision reflects Department for Education guidance*
3. *New adult, further and higher educational facilities will be supported, where:*
 - a. *they are located in areas of high public transport accessibility but particularly in or at the edge of town centres;*
 - b. *it can be demonstrated there is a local need for the facility;*
 - c. *information to ensure the quality of the facility, such as certification and registration details, is provided by the applicant; and*
 - d. *where proposed at ground floor level within a designated town centre boundary, active frontages are provided*

Justification

Tower Hamlets continues to experience significant improvements in education attainment and the borough's schools have been identified as amongst the best urban schools in the world²⁹. In order to continue this improvement and support the growing population additional, high quality school places are required³⁰. The borough's levels of childhood obesity are far higher than national averages³¹. In order to help address this, as well as the borough's shortfall of open space, it is of even greater importance that school children have access to adequate open space for exercise and recreation. In addition to securing sites for future schools, through the site allocation process (chapter 5), parts (1)

²⁷ LBTH Public Health Joint Strategic Needs Assessment, 2015

²⁸ LBTH Infrastructure delivery Plan, 2016

²⁹ LBTH Community Plan, 2015

³⁰ LBTH Infrastructure Delivery Plan, 2016

³¹ LBTH Public Health Joint Strategic Needs Assessment, 2015

and (2) of the policy allows for the provision of additional school places. It also seeks to ensure that new school facilities are provided in high quality environments which promote learning and physical activity.

The borough currently faces a skills gap between the qualification of residents and the skills required for local jobs. This is reflected in higher than average levels of unemployment, despite the borough's high number of jobs³². High quality, further, higher and adult education facilities are key to addressing this gap. Part (3) seeks to ensure the on-going provision of such services through protecting and promoting these high quality facilities.

Policy Implementation

Proposals for new schools or expansion of existing schools should address the most recent guidance and standards from the Department for Education to satisfy CSF4 (1) and (2).

In relation to CSF4(3), for the purpose of this policy "Further, Higher and Adult Education Facilities" refers to the stage of education after secondary school and contains a wide range of provisions including universities, colleges and Idea Stores, which provide lifelong learning. When considering proposals for new further and higher education facilities, the Council will require all of the criteria listed under part (3) of the policy to be satisfied. For the purposes of part 3a, new facilities will be supported within or at the edge of town centres (those defined within the policy TC1 of the Local Plan).

In order to satisfy part (3b) of the policy it will be necessary to demonstrate that the new facility is addressing a local need for life-long learning for the local community. Existing unimplemented planning permissions and other undetermined applications should be taken into account. Through applying part 3c, it will be necessary to provide evidence of the relevant certification from the Department for Education as well as details regarding student and staff numbers, details of enrolment and curriculum details to demonstrate that the courses provided are Level 4 and above.

CSF5: Health and Medical Facilities

- 1. Health facilities will be directed to locations within the CAZ, Activity Areas, secondary frontages of Major and District centres and Neighbourhood centres, unless it can be demonstrated that the proposal is of an appropriate nature and scale to the accessibility of its location and is compatible with surrounding uses*

Justification

The policy provides further details and guidance to the strategic policy CSF1. The expected growth in the borough's population will mean that additional or expanded health facilities will be required across the borough³³; including securing sites for future health services through the site allocation process (see chapter5). Health facilities are directed to locations with greatest accessibility and commercial activity, unless it demonstrated that they are of such a nature or scale that their effective catchment area is of a walkable distance (10 minutes). It is assumed that most GP surgeries will fulfil these criteria.

Policy Implementation

Where loss of health facilities is proposed, the applicant should demonstrate that the site is not required for health uses and can be supplied elsewhere including providing an up to date Council or

³² LBTH Community Plan, 2015

³³ LBTH Infrastructure Deliver Plan, 2016

NHS Strategy (where relevant); and statements from relevant providers that alternative health uses would not be possible in the premises.

CSF6: Sports and Leisure

1. *Proposals which provide new sports pitches will be supported*
2. *The loss of existing sports pitches will be resisted, unless it can be robustly demonstrated that it can be more effectively provided elsewhere*
3. *The provision of large-scale Leisure Centres which include a range of facilities will be directed to accessible locations*
4. *Smaller single function sports and leisure facilities such as gyms, dance schools and yoga studios, will be directed to the CAZ, secondary frontages within Major and District centres (or basement/upper levels within primary frontages), and neighbourhood centres unless land available is insufficient for viable operation or the town centre would be undermined through loss of active frontage*
5. *Where new sports and leisure facilities are proposed in other locations, applicants should demonstrate that the facility is accessible, that it is of an appropriate scale to its surroundings and that there is a need for the facility in the local area*

Justification

The policy provides further details and guidance to the strategic policy CSF1. Access to high quality leisure facilities is key to enabling healthy and active lifestyles. As the population increases, further such provision is required³⁴. Sports and Leisure facilities include a number of different types of facilities, including playing pitches for team sports, large scale multi-purpose leisure centres, primarily delivered by the Council, and a number of smaller more specialist centres, primarily delivered by the private sector.

CSF6 (1) and (2) of this policy recognise that the borough currently has an insufficient number of playing pitches to meet local need³⁵. It is expected that due to population increases, and the limited number of additional facilities, this shortfall will have increased. The Council will undertake new work to inform approaches which could be used to help address this shortfall.

Part (3), (4) and (5) seeks to direct the provision of smaller single function leisure facilities within the CAZ, Activity Areas and town centre locations as a first priority to ensure accessibility and maintain the vitality and viability of town centres. However, it is recognised that for some facilities a town centre location may not be practical due to a lack of space. There could also be negative impacts on the attractiveness and function of the town centre due to loss of active frontage and loss of space for retail uses. Where proposed within designated town centre locations and particularly within primary and secondary frontages, this consideration can be addressed by encouraging usage of upper or basement floors. There will be an increasing need to better utilise school facilities for the wider community, which are also infrequently found in or around town centres, and new sports facilities as part of schools will be encouraged.

Policy Implementation

For CSF6 (2), evidence to demonstrate the more effective provision elsewhere, could include an up-to-date Council strategy, an assessment comparing the accessibility of the current and proposed alternative locations which reflects the needs of existing users, or similar.

³⁴ LBTH Infrastructure Deliver Plan, 2016

³⁵ LBTH Open Space Strategy 2006

For CSF6 (3), these facilities must be located in widely accessible locations, such as near transport interchanges. Large scale multi-use Leisure Centres is any Leisure centre which meets or exceeds the size guide provided by Sport England or an Affordable Sports Centres with Community 25m Pool³⁶.

In order to meet the requirements of CSF6 (5) applicants will be required to address possible impacts including the impact of people arriving and leaving the facility and impact on the highway network and parking facilities in accordance with the relevant transport policies: TRN2.

CSF7: Community Centres and Places of Worship

1. *Development proposals for new community centres/halls, meeting places/social clubs and places of worship should demonstrate:*
 - a. *that there is a need for the facility;*
 - b. *that the site is in an accessible location;*
 - c. *that where proposed within residential developments the facility will be easily accessible to people living outside of the development;*
 - d. *that there is not already excess capacity in existing facilities in the local area; that the proposal is of an appropriate size and scale for its locality; and*
 - e. *that the facility would not cause harm to the amenity of surrounding properties.*

Justification

The policy provides further details and guidance to the strategic policy CSF1. Community centres and places of worship play a vital role in both the social life and economy of Tower Hamlets. In some cases community centres are provided as part of new development without adequate need or access to people from outside of the development. This can make them poorly or inefficiently used. Therefore this policy seeks to ensure that any new facilities meet an un-met need.

This policy also seeks to ensure that places of worship are appropriately located so as to ensure that they are able to support the number of people using them, and that they are easily accessible to their catchments.

Policy Implementation

Part (1) manages the provision of community centres/halls, meeting places/social clubs and places of worship. Typically these might be managed by the public or third sectors, religious organisations, sports or residents/tenants associations. To ensure that such facilities are well-used and accessible to the wider community, they will be directed to locations where they will be accessible to the communities they will be serving. Applicants should therefore outline who the proposal is targeting and how those people will be able to access the facility, for example being in proximity to transport interchanges or within town centres. This should also address the possible impacts including the impact of people arriving and leaving the facility and impact on the highway network and parking facilities. To ensure that need exists for the facility, applicants should provide details of other similar facilities within the local area including taking account of consented but unimplemented schemes, or outline a need that is unmet by existing facilities and cannot feasibly be met by those facilities.

³⁶ <https://www.sportengland.org/media/10289/facility-costs-2q16.pdf>

CSF8: Cultural Facilities

1. *New provision and expansion of existing cultural facilities (such as art galleries and studios, cultural centres, exhibition spaces and museums) will be supported:*
 - a. *New facilities should be located within Tower Hamlets Activity Areas, CAZ or designated town centres unless:*
 - i. *it can be demonstrated that such uses will not result in adverse impacts on the amenity of the surrounding area;*
 - ii. *the proposed location has good public transport accessibility; and*
 - iii. *existing venues in designated town centres would not be undermined*
 - b. *Where temporary uses are proposed, the criteria outlined under parts (a) (i-iii) above will be applied on a case-by-case basis based on the merits of individual applications*

Justification

CSF8 (1) recognises the important social and economic role cultural facilities play and seeks to direct them to Town Centres to ensure their accessibility and to provide a mix of uses with Town Centres. It also recognises that there is increasing demand for this form of provision, for example there is capacity for 4 new cinema screens in the borough by 2021; increasing to 8 by 2031. This could support a medium sized multiplex³⁷. Part (1b) recognises that temporary uses, especially those which activate disused spaces, can help improve the vitality of town centres as well as provide more affordable spaces for community activities or start-up businesses.

Policy Implementation

For the purposes of CSF8 cultural entertainment facilities include but are not limited to:

Facilities within the D1 use class such as:

- Art galleries
- Exhibition halls
- Museums

CSF8 does not include facilities that can be considered to be cultural venues such as bingo halls, cinemas, concert/music venues, nightclubs and theatres which are managed through Policy TC6.

CSF.9: Public Houses

1. *Where the loss of a public house is proposed, in addition to CSF1(1) the following criteria will also apply:*
 - a. *Evidence must be provided demonstrating that the public house has been marketed for at least one year as a public house, free of tie and restrictive covenant, at a price or rent agreed through independent professional valuation and that following the marketing exercise there has been no interest in the property and there is no realistic prospect of continuing pub use*
 - b. *It should be demonstrated that all reasonable efforts have been taken by the current/most recent operator to preserve the facility as a public house including evidence of appropriate maintenance and upkeep and efforts to diversify the business*

³⁷ LBTH Town Centre Retail Capacity Study (draft), 2016

- c. *If the requirements of parts (1a) and (1b) are satisfied, it must also be demonstrated through marketing evidence that there has been no interest in the property for an alternative community use over a further 12 month period*
 - d. *Proposals will not be supported where the pub has become unviable as a result of previous development, such as conversion of ancillary accommodation or function space, re-development of external space or inadequate floorspace being retained for pub use*
2. *Where re-provision of a public house is proposed, adequate floorspace must be provided to ensure the continued viability of the pub. Subsequent proposals to convert re-provided pubs that have not been let or sold to other uses will still be subject to the requirements of CSF6 (6)*
 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*

Justification

As supported by the London Plan (paragraph 4.48) CSF9 (1-3) seeks to provide better protection of the borough's public houses (also referred to as 'pubs'). This is to address recent research which found that the borough has seen over a 52% net decline in pubs since 2000, as well as the concern expressed by residents during the community consultation regarding the closure of pubs. Part (3) sets out specific evidence criteria to justify the loss of pubs, reflecting the unique challenges facing pubs. Policy has also been put forward to mitigate tactics used to circumvent evidence requirements or intentionally undermine, and also to ensure that pubs are genuinely offered for sale or let at an appropriate market rate without restrictive covenant so as to ensure they are genuinely unviable rather than being hindered by tied ownership models, inflated supply prices or unreasonable rents.

Part (2) seeks to avoid future examples in the borough of what are termed 'Trojan Horse' pubs. This term originated from a Planning Inspector and refers to developments that have met policy requirements by re-providing floorspace for pub use but at a level that is insufficient to be practically let as a pub, often seeking to subsequently convert the space to an alternative use. This part of the policy, along with part 3, seeks to ensure that there is a genuine intention to continue pub use where redevelopment is proposed.

It has identified that part of the value of pubs as community assets which further the wellbeing of local people, particularly within dense urban areas, is the provision of external space. Function rooms also provide important spaces for community use. Provision of ancillary staff living accommodation can also be important for the viability of pubs. Part 3 manages such proposals within the curtilage of public houses that may have an impact on pub viability.

Policy Implementation

To satisfy CSF9 (1a), the applicant should 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, whether any part of the property was excluded, and that it was indeed offered free of tie and restrictive covenant). The report should outline who valued the property, and provide examples of the asking rents or sale prices of similar properties on comparable terms. There should be full written 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 months period outlining attempts to let the property for alternative community uses as described by CSF1.

To satisfy CSF9 (1b), the applicant should provide written and photographic evidence demonstrating that the pub has been kept in a condition conducive to attracting and retaining custom and use. Alternatively, if the property has not been appropriately maintained, the Council 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 be provided. It should also be demonstrated that genuine attempts

have been made to operate the pub as a going concern and improve its performance if failing, including food offer, quiz nights, live music, comedy, community events and utilising ancillary space such as function rooms.

To satisfy CSF9(2) 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. It must also be demonstrated that appropriate soundproofing is to be installed so as to minimise conflict between the pub and any residential use.

To satisfy CSF9(3) applicants seeking to reduce or remove outdoor space must demonstrate that 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. This could include submitting examples of comparative pubs. 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. Where loss or conversion of ancillary function space or living accommodation is proposed, it must be demonstrated through provision of trading accounts that 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.

7. Open Spaces

Introduction

Tower Hamlets has a number of valued green spaces and waterways which offer many benefits for people, the environment and the local economy, including recreational, biodiversity, and health and wellbeing values.

However, the overall provision of publicly accessible open space in the borough remains low with some parts of the borough being acutely deficient. A recent audit of the borough's open spaces indicates that the current deficit in terms of the provision of publicly accessible open space is 84.82 hectares. As the population increases so will the publicly accessible open space deficit, alongside the increasing development pressure and the reducing land available for its provision. It is estimated that 220 more hectares of open space will be required by 2031 to meet the local need. This equates to the delivery of 2 to 3 additional publicly accessible open spaces the size of Victoria Park.³⁸

In a land constrained borough like Tower Hamlets, this is not realistic and therefore, it is important that the borough's existing open spaces are well protected and enhanced. In addition, the Council must explore opportunities for the provision of new open spaces. An updated Green Grid Strategy has been commissioned and it aims to identify opportunities to create a better connected network of green spaces and water spaces via new and enhanced green links.

Tower Hamlets' valuable network of water spaces will be enhanced and made more accessible for recreational and water related uses to contribute to the overall quality and sustainability of the borough and in line with London Plan policies.

This section contains:

- Strategic Policy SP OS1: Creating a Network of Open Spaces
- Strategic Policy SP OS2: Enhancing Water Spaces
- Policy OS3: Open Space and Green Grid
- Policy OS4: Protecting the Blue Ribbon Network

Strategic Policy OS1 Creating a Network of Open Spaces

1. *Development should support the delivery of a high quality, well - connected and sustainable network of open spaces by:*
 - a. *Protecting and safeguarding all existing open space to ensure that there is no loss.*
 - b. *Mitigating pressure on publicly accessible open spaces from new developments;*
 - c. *Maximising opportunities for new publicly accessible open space, of a range of sizes and for a range of users;*
 - d. *Assisting the delivery of new strategic publicly accessible open spaces, including the Lea River Park and Olympic Park;*
 - e. *Improving the quality, value and accessibility of existing publicly accessible open spaces across the borough and neighbouring boroughs;*
 - f. *Delivering an improved network of green corridors in line with the Council's Open Space Strategy and Green grid Strategy and building upon the principles of the Mayor of London's All London Green GridSPG and the Lee Valley and Finchley Ridge Area Framework;*
 - g. *Promoting publicly accessible open spaces as multi-functional spaces that cater for a range of activities, lifestyles, ages and needs;*

³⁸ LBTH Infrastructure Delivery Plan (2016)

- h. Improving access to the strategically important publicly accessible open spaces, which currently include Metropolitan Open Land (East India Dock Basin and Brunswick Wharf, Island Gardens, Lee Valley Regional Park, Meath Gardens, Mile End Park, Mudchute Park and Millwall Park, Tower Hamlets Cemetery, Victoria Park) as well as the Olympic Park, Lea River Park and the Leaway; and
- i. Creating new green corridors and enhancing existing ones to connect publicly accessible open spaces to main destination points, such as town centres, public transport hubs, schools, health facilities, other publicly accessible open spaces and water spaces

Justification

The provision of publicly accessible open space varies across the borough. Areas of open space deficiency have been identified³⁹. The accessibility of open spaces is measured by looking at the walking distances to open spaces of particular sizes, as set out in the London Plan.

The overall provision of publicly accessible open space in the borough falls below the local development standard of 1.2ha per 1000 people as set out in the Open Space Strategy 2006. 2015/16 public open space provision is 0.90ha per 1,000 population and this is expected to fall to 0.64ha by 2030/31 unless further open space is secured.⁴⁰

An independent audit⁴¹ of the quality and values of the borough's open spaces using national standards found that over a quarter (26.7%) of the publicly accessible open spaces are of a high quality and high value, meaning the standard of the open spaces is high with an appropriate range of activities being offered. Just under a third (32.6%) of the assessed open spaces are of a low quality and low value with a range of opportunities to address the quality and value of existing spaces. The range of functions of the open spaces with a low value could be increased, to meet a broader range of needs by diversifying the function of open space and providing appropriate facilities for active recreation.⁴²

Publicly accessible open space in the borough is very heavily used with limited capacity to accommodate further use. The shortfall of open space is growing and is projected to continue to grow mainly due to borough's estimated population increase.⁴³ Pressure on smaller open spaces will be reduced through ensuring the borough's open space network is well promoted and linking open spaces through the borough's green corridors and waterways.

Delivering large open spaces in Tower Hamlets will continue to be a challenge. The reducing number of available sites in the borough is increasing land values and creating land use pressures. The current high values of residential development mean that other land uses, including open space, will come under increasing pressure for conversion to housing provision and there will be a reduced amount of land available for additional provision of these uses.

To address these challenges, OS1 seeks to vigorously protect the borough's existing open space and optimise the quality, value and usability of publicly accessible open spaces.

Policy OS1 is supported by the London Plan (2015)⁴⁴ which promotes the creation of new open spaces and ensures that the loss of protected open spaces is resisted.

GLA's All London Green Grid SPG (2012)⁴⁵ also promotes the increase of delivery of green infrastructure for London by protecting, conserving and enhancing London's network of high quality, well designed and multifunctional green and open spaces that is well connected and integrated with

³⁹ LBTH Infrastructure Delivery Plan (2016)

⁴⁰ LBTH Infrastructure Delivery Plan (2016)

⁴¹ LBTH Open Space Audit (2016)

⁴² LBTH Open Space Audit (2016)

⁴³ LBTH Open Space Study

⁴⁴ Policy 7.18, The London Plan (2015)

⁴⁵ All London Green Grid SPG (2012), GLA

the Blue Ribbon Network. It identifies strategic green infrastructure opportunities for Tower Hamlets including the delivery of a new 100ha Olympic Park as part of the legacy of the 2012 Olympics and creation of a continuous north - south footpath through the Lea Valley to the Thames and a series of new open spaces as part of the Lea River Park.

By maximising opportunities for the creation of new and by protecting and enhancing the existing publicly accessible open spaces Policy OS1 will also contribute to enhancing the borough's biodiversity, which is an indicator for sustainable development and is not only important in its own right, but is also able to help us to adapt to climate change, militating against the urban heat island effect and increased risk of flooding.⁴⁶

Open space deficiency also has implications for biodiversity. Biodiversity

Open and green spaces are important for promoting health and wellbeing. Safe and high quality publicly accessible open space plays a vital role in improving a number of aspects of people's mental and physical health and wellbeing as well as various social and environmental indicators.⁴⁷

Contact with green spaces and natural environments can reduce symptoms of poor mental health and stress, and can improve mental wellbeing across all age groups.

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

Policy Implementation

OS1 Part 1 seeks to ensure that development does not result in net loss of open space and opportunities for the creation of new and enhancement of existing publicly accessible open spaces are maximised in accordance with LBTH Open Space and Green Grid Strategies and in line with the principles of GLA's All London Green Grid SPG.

Policy OS1 promotes innovative approaches to delivering new open spaces as well as locating parks in areas of the borough where accessibility to public open spaces is poor by creating smaller open spaces (e.g. Tower Hamlets local parks and pocket parks), which could play a vital role in increasing accessibility.

Strategic Policy OS2 – Enhancing Water Spaces

1. *Development should support the creation of a network of high quality, usable and accessible water spaces through:*
 - a. *Identifying opportunities for new water spaces;*
 - b. *Protecting and safeguarding all existing water spaces to ensure no net loss;*
 - c. *Improving the quality, value, usability and accessibility of the environment of water spaces including the immediate area and water quality;*

⁴⁶ LBTH Local Biodiversity Action Plan (2014)

⁴⁷ Faculty of Public Health briefing Paper (2010)

- d. *Preventing deterioration and enhancing the aesthetic, ecological and biodiversity values of the borough's water spaces;*
- e. *Improving accessibility to and along water spaces to maximise usability and promote these places for cultural, recreational and leisure activities.*
- f. *Improve links between water spaces and other open spaces;*
- g. *Ensuring that new development responds positively and sensitively to the setting of water spaces while respecting and animating water spaces to improve usability and safety;*
- h. *Using water spaces for movement, including passenger and freight transport;*
- i. *Protecting the Tower Hamlets Docks from further loss; and*
- j. *Ensuring residential and commercial moorings are in locations that do not negatively impact on water spaces or navigation*

Justification

The London Plan (2015)⁴⁸ recognises the value and importance of the Blue Ribbon Network and its potential to contribute to the overall quality and sustainability of London by prioritising uses of the water space and land alongside it safely for water related purposes, in particular for passenger and freight transport.

There is significant demand for increasing boat numbers on London's canals, which will have a number of impacts on canal infrastructure, existing boaters and canal-side properties, particularly air and noise pollution and overcrowding. Creating additional moorings could help alleviate these issues⁴⁹.

Inland waterways make a positive contribution to the economy, society and the environment and should be safeguarded for water resourcing purposes with consideration for the need for water management, improving water quality, managing land drainage, and avoiding, reducing and managing flood risk. Public access to inland waterways should be encouraged for recreation use⁵⁰.

The borough's docks have dramatically decreased as a result of development and the Council will seek to preserve the historic dockland heritage.

Policy Implementation

OS.2 aims to ensure that development does not result in further loss of the borough's valuable water spaces and does not restrict their public access, use and enjoyment. The policy seeks to ensure that development maximises the opportunities for promoting water spaces for cultural, recreational and leisure activities in line with the London Plan (2015) Policy 7.27 and also protects and enhances water quality and biodiversity.

Development will be expected to deliver this by a coordinated approach taking into consideration policies and guidance issued by the Canal and River Trust, the Port of London Authority, London borough of Newham and the London Legacy Development Corporation (LLDC) and other relevant agencies.

Development within and along the borough's water spaces should contribute to the delivery of the vision of the Thames Estuary 2100 Plan (TE2100)⁵¹ and should follow the specific recommendations on how to manage tidal flood risk. Further guidance on Flood Risk Management is included in Policy ES3 (Flood Risk)

⁴⁸ Policy 7.24, London Plan (2015)

⁴⁹ More or Less: Moorings on London's Waterways, Canal and Rivers Trust, (2013)

⁵⁰ Inland Waterways: Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System, British Water (2009)

⁵¹ The Thames Estuary 2100 Plan (TE2100), as amended in 2014, Environmental Agency

The Council will seek also ensure that development contributes to the vision and objectives of the Port of London Authority Strategic Priorities and Thames Vision Project⁵², which aims to maximise the river's potential through:

- More trade and more jobs;
- Inland freight – More goods off roads onto the river;
- Passenger transport – More journeys;
- Sport and recreation – More participants;
- Improved tidal Thames environment; and
- More people enjoying the Thames and its banks.

OS3 – Open Space and Green Grid

1. *Development will be required to provide or contribute to the delivery of an improved network of open spaces and green corridors in accordance with the Council's Green Grid Strategy and Open Space Strategy*
2. *Development on areas of open space will only be allowed in exceptional circumstances where:*
 - a. *it provides essential facilities that enhance the function, use and enjoyment of the open space; or*
 - b. *as part of a wider development proposal there is both an increase of open space and a higher quality of open space is achieved*
3. *Any development adjacent to, or in a close proximity to the Green Grid network should demonstrate that it will not have negative impacts on the access, design and usability, as well as the biodiversity and recreational value of the Green Grid network and that it will contribute to the expansion and the enhancement of green infrastructure linkages*
4. *Major developments should contribute to the delivery of new publicly accessible open space on site which should:*
 - a. *be of a high quality and provide facilities to promote active recreation and healthy lifestyles;*
 - b. *be well-connected to other open spaces in accordance with the Council's Green Grid Strategy; and*
 - c. *enhance biodiversity, contributing to the objectives identified in the Council's Local Biodiversity Action Plan*
5. *Development should not rely upon existing publicly accessible open space to contribute to policy required minimum on site communal amenity space and child play provision*
6. *Development should not adversely impact on the public enjoyment, openness, ecological and heritage value of the borough's strategically important publicly accessible open spaces including Metropolitan Open Land (MOL), the Olympic Park and the Lea River Park*
7. *Proposals for community allotments, gardens and pocket parks will be encouraged, particularly where they bring into use vacant developable land on a temporary basis*

Justification

Policy OS.1 sets out how new development will be required to contribute to the creation of a high quality and multi-functional network of open spaces through protecting and improving the existing

⁵² Thames Vision Project (July 2016), Port of London Authority

open space, creating new open space and improving access to and connections between open spaces in line with the principles of Strategic Policy SP OS.1.

This policy aims to ensure that development does not negatively impact on the existing network of publicly accessible open space and does not place any excessive additional pressure on its capacity.

Policy OS.1 will ensure that proposals acknowledge the recreational, biodiversity and health values of surrounding open spaces and contribute to their expansion and enhancement. This is crucial to addressing the borough's open space deficiency and improving air quality to improve people's health and wellbeing and create pleasant and liveable places.

Policy Implementation

The level and form of contribution the Council will require under part (1) will depend on the nature, scale and location of the development. The Site Allocation section (Reference to the relevant section) identifies those sites which will be required to provide new local parks.

For the purpose of this policy, open space includes all open areas consisting of Metropolitan Open Land, major and local parks as well as squares; playgrounds; ecological spaces; housing amenity land; outdoor sports facilities; allotments; and burial grounds as well as rivers, docks, lakes, canals etc. whether or not they are accessible to the public. It does not include private amenity space and areas of communal residential amenity space which are not publicly accessible.

The Council will resist any development on areas of open space unless in the circumstances specified in Policy 2a and 2b.

In any of the circumstances described in 2a and 2b, it must be demonstrated that the development 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.

The types of development the Council will consider under 2a include facilities such as 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.

Through applying 2b, the Council recognises 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 Part (1) of this Policy.

For the purpose of this policy, Green Grid means a combination of spaces and routes that encourage people to walk, cycle and enjoy their local environment, including open spaces whether or not they are publicly accessible.

Development sites located adjacent to the Green Grid or in close proximity to the Lea Valley Regional Park, Lea River Park and the Thames Path National Trail and towpaths, will be required to contribute to linking existing open spaces and water spaces through green corridors in accordance with the Council's Green Grid Strategy and in line with the All London Green Grid SPG. This should be supported by adequate signage and facilities for visitors.

On larger schemes where development is considered to place significant additional demand on existing publicly accessible open spaces, the Council will seek the provision of new publicly accessible open space on site.

Where publicly accessible open space is provided on site it should be visible and accessible from the public realm surrounding the site; be of a high quality and inclusive design that supports active

recreation and play; incorporate soft landscaping and Sustainable Urban Drainage Systems; and contribute to enhancing biodiversity in line with LBTH Local Biodiversity Action Plan.

Future management and maintenance of these new publicly accessible open spaces will be secured by appropriate planning conditions or legal agreements to ensure the highest possible level of public access, function and use. This will need to be specified in the development's Management Plan, submitted as part of the application package.

Where the development provides new publicly accessible open space that meets all criteria specified above, the Council may consider reduction of the development's Community Infrastructure Levy. The provision of amenity space or landscaping required as part of good site design and to mitigate against high density development, whether it is publicly accessible or not, and as required by Policy H3 will not be considered as appropriate provision for reducing the Community Infrastructure Levy liability of a development.

Where on site provision of adequate publicly accessible open space is not possible, a contribution will be sought to the delivery of the Council's Open Space and Green Grid Strategies through a planning obligation or as part of the Council's Community Infrastructure Levy.

Major residential developments should not place undue pressure on public open space and will not be allowed to rely upon nearby public open space and the Council will not support any variations to the provision of adequate outdoor communal amenity space, including children's play space as specified in policy H3 due to the limited capacity of public open space to absorb further use by the additional demand generated.

For the purpose of this policy strategically important publicly accessible open spaces currently include Metropolitan Open Land (East India Dock Basin and Brunswick Wharf, Island Gardens, Lee Valley Regional Park, Meath Gardens, Mile End Park, Mudchute Park and Millwall Park, Tower Hamlets Cemetery, Victoria Park) as well as the Olympic Park, Lea River Park and the Leaway.

Metropolitan Open Land (MOL) is a London unique designation, as per the London Plan (2015), for London's strategically important open space and it is afforded the same level of protection as the Green Belt by the London Plan⁵³.

The open spaces, waterways and recreational facilities of the Lee Valley Regional Park form an important part of the borough's green and blue grid networks and connect the borough with the wider Regional Park. The Park is a valuable resource for the borough with potential to contribute to creating healthy and liveable communities, particularly where links into this network can be enhanced and complemented by new open space delivered as part of development. The 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. The Council will support and work with the Authority to deliver proposals set out in the Park Plan 2000 and Park Development Framework where they relate to the borough.

The Lea River Park connects Queen Elizabeth Olympic Park to the Royal Docks and the River Thames with new continuous public parklands - 'completing' the 26-mile long Lee Valley Regional Park. The strategic first phase of this vision is the delivery of a linear park named the Leaway, which creates a continuous walking and cycling route along the River Lea.

Having access to and using shared, green public spaces and wider green infrastructure can contribute to increased social cohesion and reduced social tension⁵⁴. This policy encourages the creation of community allotments, gardens and pocket parks which contribute to the integration of different groups by providing opportunities and facilities that enable new social interactions and learning from

⁵³ Policy 7.17, the London Plan (2015)

⁵⁴ The Health and Social Benefits of nature and Biodiversity protection, Institute for European Environmental Policy (2016)

each other while at the same time encourage activities contributing to a range of benefits related to health and social wellbeing.

OS4 Protecting the Blue Ribbon Network

1. *Development within or adjacent to the Blue Ribbon Network will be required to demonstrate that:*
 - a. *it does not result in loss of water spaces;*
 - b. *it does not have a harmful impact on navigation, biodiversity, visual amenity, openness and the character of the water spaces, taking into consideration the adjacent land and the amenity of existing surrounding developments;*
 - c. *it, wherever possible enhances the quality of the water space including, the ecological, biodiversity and aesthetic quality, taking into consideration design and landscaping of the adjacent land area;*
 - d. *it does not compromise other existing active water uses;*
 - e. *it does not restrict public access to the Blue Ribbon Network;*
 - f. *It will improve the quality of the water space including the adjacent land area and water quality in accordance with the Council's Local Biodiversity Action Plan;*
 - g. *it will provide increased opportunities for public access, use of the water spaces for transport, cultural, recreational and leisure activities and other water-related uses;*
 - h. *it will not result in increased flood risks, taking into consideration the site and the surrounding area; and*
 - i. *it will not result in partial or complete in-filling of the borough's docks*
2. *Development within or adjacent to the Blue Ribbon Network will need to provide suitable setbacks from water space edges to mitigate flood risks 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*
3. *Development within the Thames Policy Area should consider the guidance provided within the most up to date supplementary guidance for the Thames Policy Area*
4. *Development adjacent to the River Thames must enhance the area's links with the river, and contribute to the completion of the Thames Path, a continuous public riverside footpath and cycleway*
5. *Proposals for moorings on the River Thames will only be considered at suitable locations, as identified by the latest Thames Vision document, and where they are open to the public and promote the enjoyment of the river.*

Justification

Water spaces play an important role within the urban area, supporting ecosystems, providing open space, residential moorings and providing transport networks. Waterways are valuable public assets, contributing to the borough's cultural and built heritage and encouraging physical and healthy outdoor activities which are essential to our health and wellbeing.

As defined by the London Plan (2015), the Blue Ribbon Network includes the river Thames and the rivers, streams, canals, docks and other open water spaces throughout the borough and the land alongside them as described in part (1).

Policy Implementation

Policy OS.4 requires the provision of detail of how the Blue Ribbon Network is protected and thereby how the various functions that the Blue Ribbon Network offers are maintained and enhanced in line with the principles of OS.2

Part (1) requires development along the borough's water spaces to demonstrate that they will not result in partial or complete in-filling and that they will not compromise their suitability for water related uses.

The edges of water spaces are an extremely important part of the functioning of water spaces as ecosystems, open space and transport networks. Part (2) requires development proposals to ensure that such areas are protected, and to provide setbacks from the edges of the water space and contribute to restoration. How this should be undertaken will need to be considered against the functions of the water space and an appropriate balance sought between uses on the water space, access to, interaction with the water space and ecological enhancements.

Setbacks from waterways are required for flood management and further details outlining their use are provided in policy ES4. Where setbacks are required they provide an opportunity to improve enjoyment of the waterways and should be designed accordingly, in order to be, and feel, publicly accessible. This should be achieved through design and signposting.

Development should support the aims of the relevant Thames River Basin Management Plan⁵⁵ and Thames Estuary 2100 Plan (TE2100)⁵⁶.

Part (3) highlights that while still part of the Blue Ribbon Network, the Thames River provides important additional opportunities to that of other water spaces within the borough. The Thames is a transport link of strategic and historical importance and provides significant economic opportunities for the borough.

The London Plan⁵⁷ recognises the River Thames as a strategically important and iconic feature of London and states that it should be protected and promoted. It requires the designation of a Thames Policy Area within boroughs and formulation of strategies and policies to manage development within those policy areas. The Council does not currently have a local Thames strategy to manage development in its designated Thames Policy Area. Development principles for the borough's stretch of the river will form part of the relevant spatial designation areas, including the City Fringe, Isle of Dogs and South Poplar and the Lea Lower Lea Valley.

Development in the Thames Policy Area, as identified on the Adopted Policies Map, will be required to take account of the importance of this area and should also address the most up to date guidance on development within the Thames Policy Area, at the time of writing the Thames Strategy East (2008)⁵⁸. It should also take into consideration any regional and local Thames strategies and SPDs. The Thames Path forms part of the National Trail. The Council is committed to maintaining a publicly accessible and well signposted continuous route adjacent to the Thames. Part (4) requires developments adjacent to the Thames to contribute towards the delivery and maintenance of the route. The route should be, and feel, publicly accessible. This should be achieved through design and signposting. Where the Thames Path cannot be delivered adjacent to the Thames, due to heritage reasons, the Council will require the development to contribute towards the signposting, design and maintenance of an alternative route. The Blue Ribbon Network has potential to provide significant opportunities for improvements to the boroughs' recreational facilities, ecology, transport networks, and quality of open space. As such, the permanent mooring of vessels, particularly where it may inhibit access to and use of water spaces will need to be given careful consideration in the context of other guidance. Part (5) requires development proposals to incorporate provisions seeking to maximise the use, access and quality of the Blue Ribbon Network.

⁵⁵ Thames River Basin District. River Basin Management Plan (2015), Environmental Agency

⁵⁶ The Thames Estuary 2100 Plan (TE2100), as amended in 2014, Environmental Agency

⁵⁷ Policy 7.29, London Plan (2015)

⁵⁸ Thames Strategy East (2008), Thames Estuary Partnership

Canal & River Trust (CRT) is developing a London Mooring strategy, which amongst other things will identify possible locations for more permanent moorings. This will be published at the end of 2017 and any proposals for moorings should follow the principles and recommendations of the London Mooring Strategy, once adopted.

The Council will work together with the Port of London Authority to determine any proposals for moorings on the river Thames to ensure conformity with the latest Thames Vision Project – at the time of writing the Thames Vision Project (July 2016).

8. Environmental Sustainability in Tower Hamlets

Introduction

The need to deliver growth sustainably across London is a pressing issue. This includes managing waste, reducing carbon emissions, mitigating flood risk and protecting biodiversity. Over the last ten years the borough's biodiversity has greatly improved. However increasing development and population puts pressure on other aspects of sustainability.

This section provides a brief introduction to the following policies areas included:

- a. Air quality
- b. Biodiversity
- c. Water Management
- d. Carbon Emissions
- e. Flood Risk
- f. Waste Management

This is followed by the policies:

Strategic Policy ES1	Protect and Enhance our Environment
Policy ES2	Improving Air Quality
Policy ES3	Urban Greening and Biodiversity
Policy ES4	Reducing Flood Risk
Policy ES5	Sustainable Water Management
Policy ES6	Achieving a Zero Carbon Borough
Policy ES7	Contaminated land and development and storage of hazardous substances
Policy ES8	Waste Management

a. Air Quality

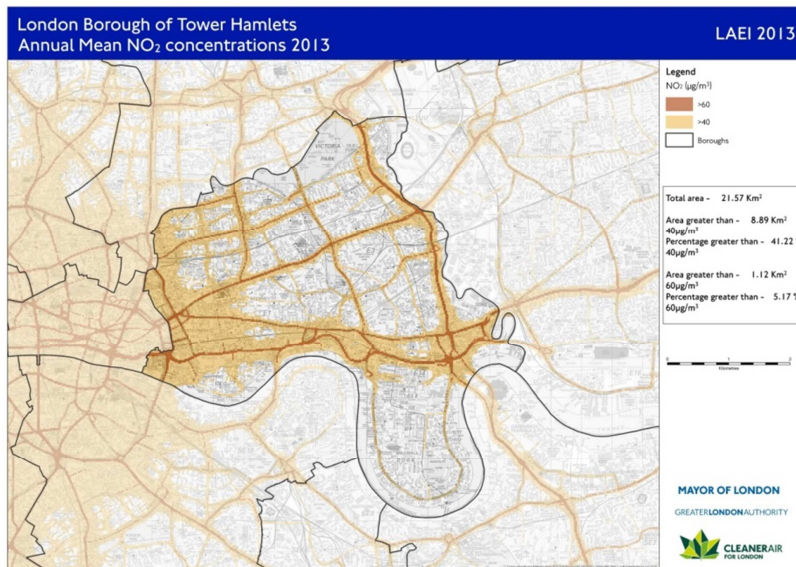
Air quality in Tower Hamlets is poor, with the whole of the borough identified as an Air Quality Management Area. Of particular concern, due to their impacts on human health, are the levels of Nitrogen Dioxide and Particulates (PM10 and PM2.5). In parts of the borough, including the City Fringe and along all major roads, the levels of Nitrogen Dioxide (see figure x) and Particulates (PM2.5 & PM 10) exceed World Health Organisation (WHO) guideline limits (and in the case of Nitrogen Dioxide EU safe legal limits)⁵⁹. In addition, just under half of the borough's primary schools are in areas where average concentrations of Nitrogen Dioxide (NO₂) are over the EU legal and safe limit⁶⁰. Road emissions are the main source of Nitrogen Dioxide and PM2.5 in the borough. This reflects the Tower Hamlets' regional position as a gateway and the number of major roads which pass through the borough⁶¹. The poor quality of both London's and the borough's air has made improving air quality a priority for both the Mayor of London and the Tower Hamlets' Mayor. To reflect this commitment a new Tower Hamlets Air Quality Action Plan is being drafted, this will inform the next draft of the Local Plan. This will also support greater regional work with the Greater London Authority and Transport for London, reflecting that it is a pan-London issue requiring pan-London solutions.

⁵⁹ GLA London Atmospheric Inventory 2013, 2016

⁶⁰ GLA Analysing Air Pollution Exposure in London, 2016

⁶¹ Tower Hamlets Air Quality Annual Status Summary Report for 2016 and LBTH Health in Planning Evidence Base, 2016

Figure 5 Levels of Nitrogen Dioxide and Particulates Level in Tower Hamlets (GLA, 2016?)



b. Biodiversity

Despite Tower Hamlets’ urban character, it is fairly biodiverse with a range of wild plants and animals in a range of habitats. There are three Local Nature Reserves and forty-six Sites of Importance for Nature Conservation (SINC) 62. However, some parts of the borough, including the City Fringe, Poplar and the western edge of the Isle of Dogs are considered to be nature deficient (see Figure 4). The Areas of Deficiency in access to nature (AODs) are defined in the London Plan Implementation Report Improving Londoners’ Access to Nature as areas more than 1 kilometre walking distance from an accessible wildlife site of at least Borough importance. Overcoming this deficiency and improving opportunities to experience nature could include providing access to living buildings and nature elements.

c. Flood Risk

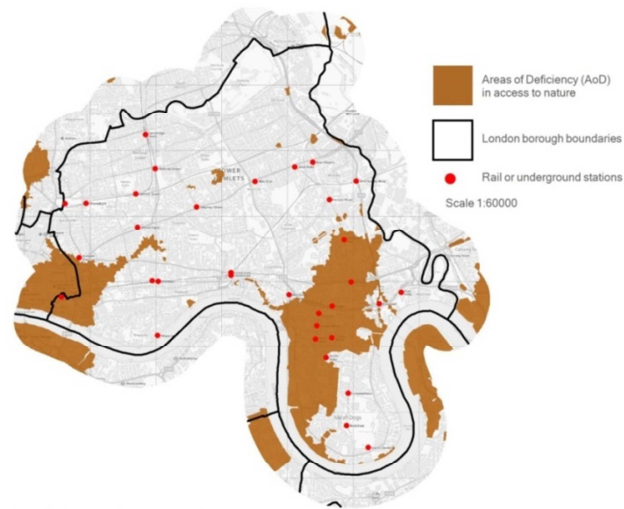
To understand local flood risk patterns and identify borough wide and development level mitigation measures, Tower Hamlets have commissioned an update to the Strategic Flood Risk Assessment, both Levels 1 and 2. Level 1 assesses flood risk for the whole borough and Level 2 assesses the flood risk of strategic development sites. Both reports make recommendations for reducing and managing flood risk. Large parts of Tower Hamlets are in Flood Zones 2 and 3a, including areas in the Lower Lea valley and Isle of Dogs where high levels of development are expected (see figure x). Whilst the Thames Barrier and other flood defences currently provide effective protection against flooding in these areas, their maintenance and upkeep is required, along with further investment in flood defences, in order to maintain this protection. Climate change will also have an impact on flood risk and must be considered in order to mitigate the risk of flood for the expected lifetime of a development. A further key 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 flooding⁶³. 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 (see figure x).

The Council is also committed to working with national and regional bodies and neighbouring authorities to seek to reduce flood risk in the borough, by maintaining and improving the existing flood defences; ensuring effective emergency-planning practices are in place; keeping up-to-date information about flood risk in the borough; and supporting the development of the Thames Tunnel and associated storm relief connections.

⁶² LBTH Biodiversity Action Plan 2014

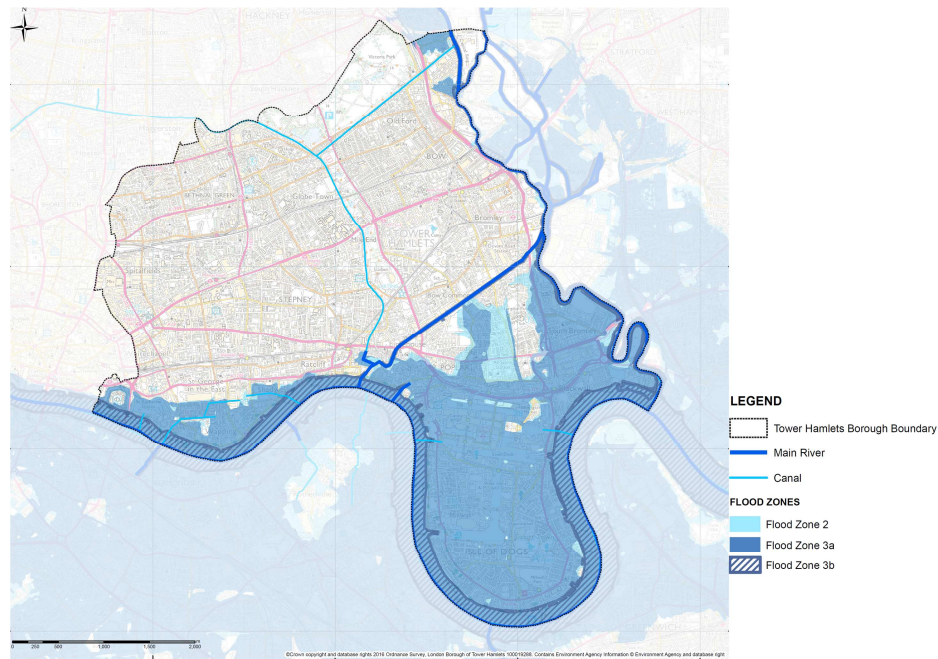
⁶³ LBTH Strategic Flood Risk Assessment, Part 1, 2016

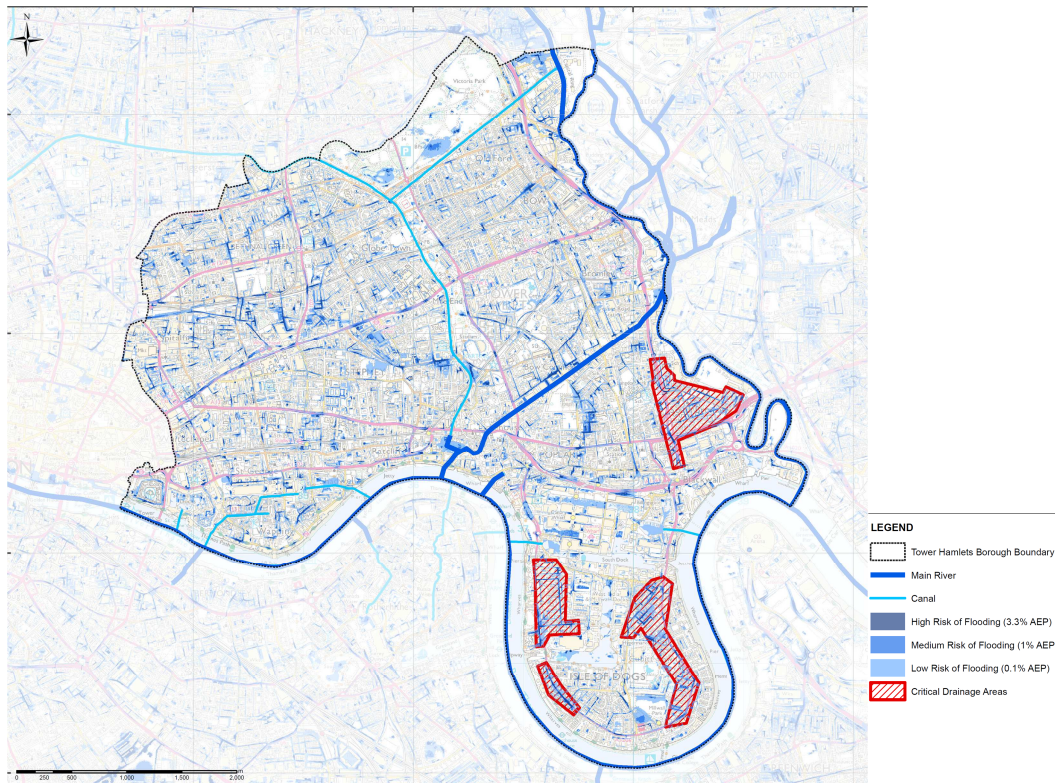
Figure 6 Areas of Deficiency in Access to Nature in Tower Hamlets (LBTH, 2016?)



Areas of Deficiency in Access to Nature in Tower Hamlets
 Produced on behalf of the London Borough of Tower Hamlets © Crown copyright and database rights 2015 Ordnance Survey 100019288
 Produced by Greenspace Information for Greater London CIC www.gigl.org.uk

Figure 7 Flood Zones in Tower Hamlets (LBTH, 2016?)





d. Water Management

London has lower rainfall than the national average while having a very high population density compared to the rest of the country. This combination of limited water resources and high demand has resulted in London being declared an area of serious water stress⁶⁴ and this trend is likely to be exacerbated by climate change.

In accordance with the GLA, the Mayor of London has set up a Water Advisory Group (WAG) which is tasked on working to develop integrated water management strategies in specific Opportunity Areas and development sites. The Mayor is also going to work with the water companies to identify and resolve strategic-level ‘pinch points’ in the capacity of water supply.

e. Carbon Emissions

Carbon Emissions in the borough have been falling steadily since the last Local Plan, however Tower Hamlets still produces the third highest level of total carbon dioxide emissions of all the boroughs in London⁶⁵. Carbon dioxide is the key greenhouse gas causing climate change. The London Plan (2015) requires boroughs to support the meeting of the Mayor of London’s 60% (below 1990 levels) carbon reduction by the 2025 target. Since the Core Strategy was adopted in 2010, the borough has only achieved a 22% reduction against this target⁶⁶. The particular cause of these higher emissions levels is the high level of emissions from industry and commercial uses (the third highest after Westminster and the City of London), reflecting the high energy uses and inefficiency of large floorplate office buildings⁶⁷. Given the existing high levels of carbon emissions and the significant levels of development expected in the borough, the Council needs progressive CO2 emission reduction within future development proposals.

The Mayor of London’s target is supported by the Energy Hierarchy, requiring developments to:

⁶⁴ EA Water stressed areas – final classification, 2013

⁶⁵ National Statistics, UK local authority and regional carbon dioxide emissions national statistics: 2005-2014, 2016

⁶⁶ LBTH Carbon Policy Evidence Base, 2016

⁶⁷ National Statistics, UK local authority and regional carbon dioxide emissions national statistics: 2005-2014, 2016

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

The Council is committed to contributing towards the Mayor of London's Carbon Emissions target through promoting the development of new decentralised energy facilities that have the potential to link into a wider sub-regional network and reducing the carbon emissions of all public buildings in the borough. The Tower Hamlets Carbon Emissions Study, 2016, prioritises the implementation of projects to reduce the Council's own Carbon emissions.

f. Waste Management

The management of waste is a pressing strategic issue embedded within the London Plan. The London Plan is working towards waste self-sufficiency in London and zero-biodegradable or recyclable waste to landfill by 2026. In order to achieve this, London boroughs, the Mayoral Development Corporation (including the LLDC) and the GLA need to work collaboratively to allocate suitable and appropriate waste sites. The GLA considers that London is moving towards a future where goods are designed to be reused and recycled (a 'circular economy'). As a result, the current approaches to managing waste systems in London should be shifted from waste to reuse so that very little waste will require disposal in the future. The GLA has been working with some of the key stakeholders such as the London Waste and Recycling Board (LWARB) to develop a route map for London's transition to a circular economy.

Tower Hamlets is both a Waste Collection Authority and a Waste Disposal Authority. The Council is committed to continue to:

- Safeguard suitable existing sites;
- Allocate land for waste management purposes totalling 1.13 hectares equating to 91,000 tonnes of capacity to manage waste covered by the London Plan apportionment;
- Identify other land including sites and areas of search that might be suited to accommodate further waste management capacity that may contribute to meeting the London Plan Waste apportionment targets for 2036;
- Work strategically with the GLA, TFL, LLDC and other waste authorities to manage as much of London's waste within London where practicable, maximise diversion of biodegradable waste from landfill and to ensure that there are sustainable arrangements in place for the Plan period;
- Release safeguarded waste sites where the transfer of capacity does not undermine strategic policy and its objectives;
- Support development of additional waste management capacity and seek its co-location with compatible uses; and
- Support the use of locally based solutions for the storage, processing, collection and management of waste on or near source developments.

In addition, the Council is also keen to reduce the amount of waste generated in the borough through implementing the Waste Management Hierarchy of:

- Prevent
- Reduce
- Reuse and recycle / compost
- Recover
- Dispose.

The Hierarchy and its objectives will be applied across development of all types. This could be achieved through supporting development which:

- enables local residents and businesses to reduce and manage their waste effectively;
- reduces and manages their waste effectively during the complete lifecycle of development;
- uses recycled and reclaimed materials; and
- uses appropriate innovative solutions to waste management.

Strategic Policy ES1 Protect and Enhance our Environment

1. *All developments are expected to minimise the use of natural resources and work pro-actively to protect and enhance the quality of the natural environment, through:*
 - a. *contributing towards meeting the objectives of the Tower Hamlets' latest Air Quality Action Plan;*
 - b. *protecting and enhancing biodiversity, with the aim of meeting the objectives of the latest Tower Hamlets Biodiversity Action Plan and improving opportunities to experience nature, in particular in deficient areas;*
 - c. *locating development, using the Sequential and Exemptions Tests, to minimise flood risk in the borough;*
 - d. *helping reduce clean and waste water use ;*
 - e. *following the Energy Hierarchy of be lean, be clean and be green;*
 - f. *improving land quality and mitigate the adverse effects of contaminated land on human health; and*
 - g. *following the Waste Management Hierarchy of preventing, reducing, reusing and recycling/composting, recovering and disposing as well as working towards managing London's waste within London*

Justification

This policy aims to sets out overarching requirements for developments in Tower Hamlets regarding environment sustainability.

Policy Implementation

This policy must be read in conjunction with other policies set out in this section.

Policy ES2 Improving Air Quality

1. *All development will be required to at least meet 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, using the GLA's approved methodology, will be 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 or health facilities or open space, including child play space; and*
 - d. *New build developments in areas of sub-standard air quality.*
3. *New build developments which propose to provide any private, communal or public open space, including child play space, in areas of sub-standard air quality, must demonstrate that the proposal has considered the positioning and design of the open space, to reduce exposure of future users to air pollution*

Justification

The whole of Tower Hamlets is currently designated as an Air Quality Management Area, mainly due to emissions from combustion engine vehicles and plant equipment. Poor air quality has well-evidenced significant negative effects on health. Given the health impacts and existing poor air quality, as well as the strong concern expressed by residents with regards to air quality, it is

imperative that development does not worsen air quality, protects future occupants from the effects of air quality and wherever possible improves air quality. This policy seeks to support the delivery of Strategic Objective 13, which highlights that air quality is an urgent priority. Part (1) ensures that development meets the London Plan Policy 7.14 and the GLA's Sustainable Design and Construction SPG 2014 requirements for developments in poor air quality areas.

While the whole of the borough is designated as an Air Quality Management Area, in some parts of the borough the air quality is below EU safe limits for NO₂ levels. Parts (2) and (3) seek to ensure a particular focus on improving air quality and protecting users from the effects of poor air quality, in these areas. It is also particularly relevant that the effects of poor air quality are addressed for certain uses. Public open space and private and communal amenity space provide much needed opportunities for residents to lead healthy and active lifestyles and provide urban greening, however the benefits of this space can be enhanced if their design and location minimises exposure to poor air quality. In addition the negative health impacts of exposure to poor air quality are particularly experienced by children, those suffering from respiratory disease, the elderly and the general population during exercise⁶⁸. Parts (2) and (3) seek to address this.

Policy Implementation

To implement Part (1), further guidance on 'the air quality neutral standard' is outlined in the GLA's Sustainable Design and Construction SPG 2014. Applicants should also refer to the relevant transport policy requirements set out in the Transport & Connectivity section.

In Parts (2) and (3), areas of sub-standard air quality, refers to areas where NO₂ levels exceeding 40 µg/m³ of NO₂ (the EU legal limit). This includes areas in which the PM_{2.5} levels exceed 10 µg/m³ annual mean PM_{2.5} (WHO guideline limits).

In Part (2) 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. The assessment should also consider the cumulative impact of surrounding developments. Cumulative Impacts should be considered for developments occurring in a 1km radius. The Air Quality Assessment and construction management plan should contain details of compliance with European Emissions Standards. The assessment must also identify and mitigate any adverse effects either during construction or operation. Mitigation measures could include, reduction of vehicular traffic levels, encouraging sustainable movement patterns, how construction is carried out, measures to reduce emissions throughout the lifetime of the building, reducing emissions from associated plant equipment, improving / greening the public realm and ensuring decentralised energy facilities do not contribute to poor air quality. This policy should be implemented alongside the Planning and Construction in New Development policy

In Part (3), mitigating measures to reduce residents' exposure, could include (in order of priority) maximising distance from pollutant source (the recommended distance would be over 50m from the pollution source⁶⁹), then considering proven ventilation systems, parking considerations (in accordance with transport policies]), winter gardens, internal layout and minimising internal pollutant emissions. This policy should be considered alongside the relevant design, open space and social infrastructure policies.

Policy ES3 Urban Greening and Biodiversity

- 1. Development will be required to maximise the provision of 'living building' elements. 'Living building' elements need to contribute to local biodiversity through the provision of priority*

⁶⁸ LBTH Air Quality Evidence Base, 2016 and LBTH Health in Planning Evidence Base, 2016

⁶⁹ LBTH Health Evidence Base, 2016

habitats, and/or features for priority species, as identified in the latest Tower Hamlets Local Biodiversity Action Plan.

2. *Developments will be required to:*
 - a. *Protect or replace existing elements of biodiversity features within the development as well as incorporating further measures to support wildlife, proportionate to the development proposed.*
 - b. *Submit an Ecology Assessment demonstrating biodiversity enhancement that contributes to the objectives of the latest Tower Hamlets Local Biodiversity Action Plan, where the site is a Major development.*
3. *Planting and landscaping around developments should not include 'potentially invasive, non-native species'.*
4. *Development will be expected to:*
 - a. *Incorporate trees wherever possible;;*
 - b. *Protect trees, including street trees; and*
 - c. *Provide replacement trees where the loss of or impact on trees in a development is considered acceptable.*
5. *Developments which would affect a Site of Importance for Nature Conservation (SINC), or significantly harm the population or conservation status of a protected or priority species, will be managed in accordance with the following hierarchy:*
 - a. *To avoid adverse impact to the biodiversity interest; and*
 - b. *To minimise impact and seek mitigation in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, and for appropriate compensation to be sought.*

Justification

The borough 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 the provision of habitats. They also have flood reduction, climatic and air quality benefits, helping to remove CO₂ from the air and reduce temperatures. Consultation responses demonstrated a strong desire to maintain and enhance biodiversity in the borough. This policy seeks to implement Strategic Objectives 8 and 10, which require development to protect and enhance the environment. Parts (1), (2), (3) and (5) seek to protect and enhance the borough's biodiversity. The benefits of trees include contributing to the beauty and quality of the street scene, providing shade and cooling to offset the 'heat island effect', providing habitats, mitigating against the risk of surface water flooding, filtering pollutants from the air and preventing shrinking and heave during hotter weather⁷⁰. Part (4) recognises this.

Policy Implementation

In implementing Part (1) the types of 'Living Building' techniques the Council will consider including 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 ES4, and Green Grid requirements outlined in Open Spaces and Water Spaces section. The provision of 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. As identified by the London Climate Change Partnership, this includes areas of green space deficiency, areas of high density development with clusters of tall buildings and areas experiencing high levels of pollution. For the purposes of

⁷⁰ LBTH Biodiversity Action Plan 2014

assessing this requirement, this includes developments within identified Areas of Deficiency of Access to Nature, Tall Building Zones, and Areas of Sub-standard Air Quality. The risk of experiencing the Heat Island Effect should be considered over the lifetime of the development.

When assessing the requirements of Part (2), consideration will be given to the size and scale of the development and whether relative provision has been made. Even minor development, such as rear extensions have the ability to provide biodiversity measures through provisions such as living roofs, walls and habitat structures such as bat/bird boxes. The latest Tower Hamlets Local Biodiversity Action Plan should be referred to for details of priority habitats, and/or features for priority species. Features of biodiversity/ecological value include veteran trees, old hedges, habitats or species identified as local, London or national priorities, and features which might support such species. The priority habitats and the species of conservation are online at <http://www.gigl.org.uk/about-gigl/londons-biodiversity-action-plan/> . Habitats & species of principal importance in England are at <http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx> References for priority species and habitats are our LBAP (local), priority habitats in the London Biodiversity Action Plan, Species of Conservation Concern in London (London) and Habitats and Species of Principal Importance in England (national – identified under s.41 of the Natural Environment & Rural Communities Act (2016)

‘Potentially invasive non-native species’ of Part (3) are defined in Schedule 9 of the Wildlife and Countryside Act 1981. In addition, planting schemes should be selected according to their suitability for local growing conditions (soil, temperature ranges, rainfall, sunlight and shade), the ability to attract wildlife (e.g. nectar rich planting) and conserve water. This will need to be evidenced in the Design and Access Statement. This policy also applies to any Open Space or Green Grid provisions made under policy OS1.

Due to the environmental importance of trees, in implementing Part (4) at least a ‘1 for 1’ replacement rate is required for any trees affected by a development. Where the Council is convinced these cannot be incorporated onsite, the Council will accept the provision of a replacement tree on a suitable site, as close to the development as possible. The Council will also expect developments to incorporate additional trees wherever possible. We will take a ‘right tree for the right site’ approach which takes account of historic context, availability of space, soil conditions, potential improvements to air and soil quality and reducing the effects of and adapting to climate change. This should be evidenced in the Ecology Assessment. This policy also applies to any Open Space or Green Grid provisions made under policy OWS.1.

Part (5) seeks to protect the integrity of any designated ‘European site’, in line with Paragraph 118 of the NPPF and London Plan Policy 7.19E. It also seeks to protect locally designated Sites of Importance for Nature Conservation (SINCs). The current SINC boundaries are under review and proposed changes are being consulted on alongside the Local Plan. The presence of protected species is a material planning consideration if a development is likely to result in harm to a habitat or species. Protected species are those identified by European and national legislation and priority species are those identified in the UK, London or Tower Hamlets Local Biodiversity Action Plans. If a protected or priority species is likely to be affected, an Ecology Assessment will be required. The Ecology Assessment should include information assessing the situation of the existing site and outlining proposals for protecting, replacement and enhancement of existing biodiversity on the proposed site, including measures for wildlife habitats and features aimed at particular species. Applications should also detail how recommendations are being included in the development proposals.

Policy ES4 Reducing Flood Risk

1. *Development will be required to provide a Flood Risk Assessment (FRA) if it meets any of the following criteria:*

- a. *The development site is over 1ha, within Flood Zone 1;*
 - b. *It is within Flood Zones 2, 3a and 3b; or*
 - c. *The development may be subject to other sources of flooding, as defined in the SFRA*
2. *All development will be required to protect and where possible increase the capacity of existing waterspaces and flood storage areas to retain water.*
 3. *Proposals for vulnerable uses, including basement developments in flood-prone areas, will be resisted unless suitable mitigation measures can be undertaken.*
 4. *All new development along the River Thames, River Lea and tributaries to be set back, allowing a minimum of a 16m (tidal river) and 8m (fluvial river) buffer strip, unless significant constraints are evidenced. Opportunities should also be considered to realign or set back defences and improve the riverside frontage to provide amenity space and environmental enhancement*
 5. *All development will be required to demonstrate how it reduces the amount of water usage, run-off and discharge from the site, through the use of appropriate water reuse and Sustainable Drainage System (SuDs) techniques*
 6. *Development proposals in Critical Drainage Areas must achieve a greenfield run-off rate and volume leaving the site. All other development proposals to seek to achieve greenfield run-off rate and volume leaving the site. Where this is not possible the minimum expectation for development proposals is to achieve at least 50% attenuation of the site's (prior to re-development) surface water run-off at peak times*

Justification

Large parts of Tower Hamlets, including our growth areas, are in Flood Zones 2 and 3a. New development must not increase the risk of flooding and must provide mitigation measures to reduce the impact, including enabling the repair and further delivery of flood defences. This policy supports the delivery of Strategic Objective 10, which requires the highest standards of environmental sustainability. Parts (1), (2), (3) and (4) seek to ensure this. In addition, development has significantly changed how natural systems work, particularly in relation to water. For example, rainfall cannot infiltrate through hard surfaces that are created by development. As a result the traditional drainage of water run-off and waste water into water bodies can no longer be sustained and is leading to a greater risk of flooding, particularly in Critical Drainage Areas⁷¹. This increases the importance of existing waterspaces and flood storage areas to retain water. Finally, basements can affect the ability of the ground to absorb rain when soil is replaced by an impervious structure and can be particularly susceptible to flooding. Parts (2), (3) and (5) seek to mitigate this risk.

Policy Implementation

In order to address Part (1), the FRA should:

- be proportionate with the degree of flood risk posed to, and by, the proposed development;
- consider the cumulative impact of existing and future development;
- consider the impact of climate change using the latest government guidance;
- consider 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;
- propose mitigation measures, taking account of the advice and recommendations set out in the SFRA
- Any development located adjacent to flood defences is required to demonstrate that these defences will be safeguarded and maintained over the lifetime of the development

⁷¹ LBTH Strategic Flood Risk Assessment, 2016

Part (2) should be considered alongside policy OS2.i of water spaces and protecting the docks.

Vulnerable uses are defined in Paragraph 067 of National Planning Policy Guidance. In order to assess part (3), the Council requires all new basement developments whether domestic or non-domestic to conduct an Impact Assessment which considers both groundwater and surface water flooding and should demonstrate that the impacts of the proposed development are acceptable, or that appropriate mitigation measures will be adopted.

The requirement for an adequate buffer zone in Part (4) between waterways and developments is to enable sustainable and cost effective flood risk management, including upgrading of river walls and embankments. A pragmatic approach should be adopted for existing development in these areas and opportunities pursued for small scale set back of development from river walls to enable these structures to be modified, raised and maintained as needed.

Where the preferred level of setback is unachievable, consideration should be given to the specific recommendations of the TE2100 plan, in requiring reduction of current and future flood risk through:

- Raising existing flood defences to the required levels in preparation for future climate change impacts or otherwise demonstrate how tidal flood defences can be raised in the future, through submission of plans and cross-sections of the proposed raising;
- Demonstrating the provision of 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, and where these have been identified as necessary through the Tower Hamlets' Infrastructure Delivery Plan.

These setback requirements can also contribute towards opportunities for public access and recreation, as outlined in policy OS2.

In order to reduce the amount of water being discharged from sites, Part 5 of the policy requires development to reduce the run-off from hard surfacing. All major development and minor development in Critical Drainage Areas will be required to submit a Drainage Strategy alongside the original planning application. All other developments will also be strongly encouraged to do so. This should demonstrate that surface water will be controlled as near to its source as possible.

Applicants are strongly encouraged to consider the requirements for SuDS, at the earliest opportunity, as this will enable their more effective integration and provision. SuDS should also be considered alongside the 'living building' requirements outlined in policy ES02, and Green Grid requirements outlined in OS.1, as SuDS can also have biodiversity and urban greening benefits.

Policy ES5 Sustainable Water Management

1. *Development proposals (including refurbishments and conversions) should minimise:*
 - a. *water consumption: with residential developments achieving water use of 105 litres per person per day for homes under the optional national technical standard, and refurbishments and other non-domestic development expected to meet BREEAM water efficiency credits; and*
 - b. *the pressure on the combined sewer network*

2. *Development proposals must 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 effect of current and proposed development*

Justification

London is an area of serious water stress⁷². Consultation responses have also expressed concern regarding water capacity in the borough. Developments should therefore seek to reduce the pressure on the fresh and waste water systems, through increasing water efficiency. This policy supports the delivery of Strategic Objective 10, which requires the highest standards of environmental sustainability while reducing the effects of climate change. Parts (1) and (2) seeks to reduce water use and ensure adequate fresh and waste water capacity for new developments.

Policy Implementation

Measures to achieve Part (1) 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 the Council's satisfaction that this is the case.

In order to meet Part (2) development are required to demonstrate that there is adequate capacity to serve the development and that it would not lead to problems for existing users. This may make it necessary for development to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity constraint of and no improvements are programmed by the water company, the development will be required to provide for the appropriate improvements which must be completed prior to occupation of the development.

Development are strongly encouraged to contact Thames Water Developer Services 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 ES6 Achieving a Zero Carbon Borough

1. *All development will be required to meet the CO2 emission reduction standards of:*

Residential development:

<i>Year</i> 2016-2031	<i>Improvement on 2013 Building Regulations: Zero Carbon (Minimum 45% reduction on-site with the remaining regulated carbon dioxide emissions to 100% to be off-set through a cash in lieu contribution for carbon saving projects elsewhere in the borough, as outlined in the Planning Obligations SPD (2016)).</i>
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Non-residential development:

<i>Year</i> 2016 – 2019	<i>Improvement on 2013 Building Regulations 45% CO2 emissions reduction</i>
2019 – 2031	<i>Zero Carbon (Minimum 45% reduction on-site with the remaining regulated carbon dioxide emissions to 100% to be off-set through a cash in lieu contribution for carbon saving projects elsewhere in the borough, as outlined in the Planning Obligations SPD (2016)).</i>

⁷² EA Water stressed areas – final classification, 2013

2. *All major residential development and major non-residential development is required, and minor non-residential development is encouraged, to submit an Energy Assessment, detailing how the development will address the following considerations:*
 - a. **Energy efficient design and building fabric** – development should maximise energy efficiency, aiming to improve on the standards set in the version of the Building Regulations current at the time of submission;
 - b. **Decentralised energy** – All development should assess the feasibility of decentralised energy; and
 - c. **Renewable energy feasibility** – All new developments should seek to provide up to 20% reduction of carbon dioxide emissions through on-site renewable energy generation, where feasible
3. *The sustainable retrofitting of existing development with provisions for the reduction of carbon emissions will be supported*

Justification

In order to contribute to meet the London Plan and Strategic Objective 12 target of a 60% reduction of carbon emissions (below the 1990 level) by 2025, Tower Hamlets needs to reduce CO2 emissions per person significantly more than most other London boroughs, as Tower Hamlets is currently the third worst performing borough within the capital⁷³. This policy maintains the Council's policy trajectory which has required progressive reductions in developments' carbon emissions. This approach builds on the London Plan's current approach and is endorsed by the GLA's Housing SPG, 2016 (2.3.57). This policy also ensures that following the revocation of the Code for Sustainable Homes, new development still contributes towards lowering energy use and carbon emissions. Tower Hamlets also has particularly high levels of emissions from industry and commercial uses (the third highest after Westminster and the City of London), reflecting the high energy uses and inefficiency of large floorplate office buildings⁷⁴. Parts (1) and (2) seek to ensure that all new developments, including non-residential development, in Tower Hamlets contribute towards reducing carbon emissions. This supports London Plan policy 5.2 and implements the recommendations of the Non-Domestic Carbon Dioxide Emissions Target Report⁷⁵. Part (1) also recognises that on-site carbon reductions have a greater impact on reducing carbon emissions, than contributions in lieu⁷⁶. Funds raised through Carbon Offsetting are spent on priorities outlined in the Tower Hamlets Carbon Offset Study (2016), which will also contribute to a demonstrable reduction in the borough's carbon emissions. This is implemented through Part (3).

Policy Implementation

In Part (1), the improvements in Co2 emissions reduction for new build developments is based on Building Regulations 2013 requirements. 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 CO2 emissions from the existing building before refurbishment.

The implementation dates for the requirements in part (1) are from 1st October 2016, for residential developments and from 1st October 2019, for non-residential developments.

In order to show compliance with Part (2), Energy Assessments should be informed by preliminary SAP (Standard Assessment Procedure) for residential developments or National Calculation Method for non-residential development. Energy Assessments should detail the measures included in the

⁷³ National Statistics, UK local authority and regional carbon dioxide emissions national statistics: 2005-2014, 2016

⁷⁴ National Statistics, UK local authority and regional carbon dioxide emissions national statistics: 2005-2014, 2016

⁷⁵ GLA Non-Domestic Carbon Dioxide Emissions Target, 2015

⁷⁶ LBTH Carbon Policy Evidence Base, 2016

development and the CO2 emission savings achieved at the time of implementing the planning permission. To ensure the Council achieves its sustainability objectives, Energy Assessments for non-major development will also be sought.

In implementing 2a, new developments should consider how the design, layout, orientation, insulation materials and other sustainable construction techniques can contribute towards maximising energy efficiency.

In implementing 2b, new developments should be designed in a manner fully compatible with any existing or planned future Decentralised Energy Network (DEN) in accordance with any relevant Energy Masterplan and the District Heating Manual for London or replacement document (including appropriate design of building systems to minimise return temperatures). New developments must connect to the DEN if that network is expected to be operational within 5 years of the development being completed. Applicants will be expected to contribute towards the costs of the DEN in line with the avoided costs of their own plant installation. Applicants will be expected to demonstrate the low air quality impacts of any DEN.

In implementing 2c, for the chosen solution, details should be provided on: energy generated and the CO2 saved; capacity and quantity of the proposed technology/ies and location of the technology/ies marked on site plans.

Part (3) will be expected to be demonstrated within an Energy Assessment.

Policy ES6 Contaminated land and development 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 will be required and remediation proposals agreed to deal with the contamination before planning permission is granted. A verification report, detailing mitigation undertaken, will be required in advance of occupation*
- 2. Development will not be supported which involves the storage or use of hazardous substances or new developments in close proximity to hazardous installations where it would cause a significant hazard to health and the environment*

Justification

Industrial activity, waste disposal, accidental spillages and transportation can cause contamination of land. Where waste products or residues remain within soils or groundwater they may present a hazard to people and the general environment and preclude some classes of development from taking place⁷⁷. Parts (1) and (2) seek to mitigate this risk. This policy helps to deliver Strategic Objectives 1 and 19, which seek to deliver housing and employment growth while protecting human health. The management of contaminated land in order to safely release land for development is key to achieving these objectives.

Policy Implementation

To add further guidance to London Plan policy 5.21 and 5.22, regarding contaminated land and hazardous substances, Part (1) of this policy provides additional guidance around protecting residents' health and the environment from contaminants and hazardous substances.

⁷⁷ LBTH Contaminated Land Strategy, 2005

For the purposes of this policy 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 strong industrial heritage, and through the application of part (1) of this policy, the Council wants to ensure the impacts of these past land uses and current land uses do not affect the health of people and the environment. The Council keeps a Contaminated Land Register 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 the Council in order to ensure that contaminated land issues are considered at the planning application stage.

Part (2) relates to the management of hazardous substances. 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. Through applying this policy, it will be necessary to demonstrate that any developments which involve hazardous substances would not cause a significant hazard to the health and wellbeing of local residents or to the local environment. With regard to parts (1) and (2) of the policy, development should refer to guidance set out in: DEFRA & Environment Agency - The Model Procedures for the Management of Land Contamination (CLR11) (2004)

Guidance for the Safe Development of Housing on Land Affected by Contamination (R&D66) (2008)
Sustainable Remediation Forum UK - A Framework for Assessing the Sustainability of Soil and Groundwater Remediation (2010)

CL:AIRE⁷⁸ Development Industry Code of Practice V2 “ The Definition of Waste” (2011)
The Council will apply the Health and Safety Executive’s PADHI 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 HSE advise against development, planning permission will only be granted in circumstances where it can be demonstrated that the benefits that would be brought by the proposed development would significantly outweigh the potential risks to health and the local environment.

Policy ES7 Waste Management

1. *Implement the waste management through supporting development that:*
 - a) *Designs appropriately for non-waste developments to incorporate waste storage.*
 - b) *Reduces and manage their waste effectively through the complete lifecycle of development.*
 - c) *Uses recycled and reclaimed materials.*
 - d) *Enables local residents and local businesses to manage their waste effectively.*
 - e) *Uses appropriate innovative solutions to waste management.*
2. *The Council will seek to be in general conformity with the objectives of the London Plan by supporting the management of the borough’s waste within London as far as is practicable, sustainable and through aiming to accord with London Plan waste apportionment target. This will be achieved through the following measures:*
 - a. *Safeguarding and allocating suitable existing sites used for waste management purposes*

Table 1 Suitable sites within Tower Hamlets

⁷⁸ CL:AIRE is a registered charity and an environmental body. For more information, please visit: <http://www.claire.co.uk>

	Site name	Overall suitability	Site area (ha)	Apportionment Capacity Contribution (tpa)
1	Clifford House, Towcester Road (within LBTH Empson Street Strategic Industrial Location)	Whole site suitable	0.46	37,000
2	Northumberland Wharf, Yabsley Street, within LBTH Safeguard Wharf site)	Part site suitable as a portion is safeguarded wharf	0.88	16,000
Total			1.34	53,000

- b. Identifying suitable sites and areas of search, in the LLDC and LBTH, that may accommodate waste management capacity capable of contributing to meeting London Plan Waste apportionment targets.

Table 2: Suitable sites within Tower Hamlets falling under the aegis of LLDC

Site ID	Site name	Overall suitability	Site area (ha)	Apportionment Capacity Contribution (tpa)
1	Iceland Metal Recycling, Iceland Wharf (LLDC, Other Industrial Location)	Whole site suitable for safeguarding and allocating	0.44	35,000
2	Land at Wick Lane, Fish Island (LLDC, Preferred Industrial Location)	Whole site suitable for safeguarding and allocating	0.69	55,000
3	455 Wick Lane (LLDC, Preferred Industrial Location)	Whole site suitable for safeguarding and allocating	0.47	38,000
Site Total			1.60	128,000

Table 3 Areas of Search within Tower Hamlets and the LLDC

Site ID	Area name	Overall suitability	Site area (ha)	Apportionment Capacity Contribution (tpa)
3	The Highway, Local Industrial Location (LBTH)	Whole site suitable for search	2.71	To be determined
4	Empson Street, Strategic Industrial Location (LBTH)	Whole site suitable for search	10.07	To be determined
5	Bow Midlands West Rail Site (LLDC)	Part of the site would be suitable for safeguarding and allocating	3.16	To be determined

6	<i>Fish Island, Strategic Industrial Location (LLDC)</i>	<i>Whole site suitable for search</i>	9.21	<i>To be determined</i>
Area Total			25.15	<i>To be determined</i>

- c. *Working strategically with the GLA, TFL, LLDC and other waste authorities to manage as much of London’s waste within London where practicable to ensure that there are sustainable arrangements in place for the Plan period.*
- d. *Releasing safeguarded or allocated waste sites where the transfer of capacity does not undermine strategic policy and its objectives.*
- e. *Supporting development of additional waste management capacity and seek its co-location with compatible uses.*
- f. *Supporting the use of locally based solutions for the storage, processing, collection and management of waste on or near source developments.*

3. *Development which seeks to provide a waste management facility will be supported where:*

- a. *they are located on sites and area of search as identified in Table 2 and 3 as established above; or*
- b. *where waste management facilities contributes towards London Plan objectives and the proposal can demonstrate:*
 - i. *it is of a scale and nature that does not compromise adjacent existing and proposed land uses and it is well integrated into its surrounding;*
 - ii. *design is high quality and ensures compatibility with surrounding uses (including within neighbouring boroughs);*
 - iii. *it is modern, innovative and flexible enough to alter its operation and capacity as circumstances change without materially increasing associated impacts; and*
 - iv. *it will not result in adverse transport, environmental and amenity impacts, including the emission of air pollutants, are mitigated to an acceptable level.*

Justification

European and national legislation as well as national and regional policy work together to address manage resources effectively and the need to move waste up the Waste Hierarchy whilst ensuring the protection of human health and the environment in line with the principles of proximity and net self-sufficiency.

The National Planning Policy for Waste (NPPW) requires the Local Plan to identify sufficient opportunities to meet the identified needs of its area for the management of waste streams, aiming to drive waste management up the Waste Hierarchy. It should ensure that suitable sites and areas for the provision of waste management capacity are identified in appropriate locations. The NPPW recommends that having considered the extent to which the capacity of existing operational facilities might satisfy any need, in searching for areas suitable for new or enhanced waste management facilities, waste planning authorities should consider opportunities for onsite management of waste where it arises, as well as a broad range of locations including industrial sites, and sites that present opportunities to co-locate new waste management facilities with existing facilities or complementary activities.

The London Plan (2015) sets an ambitious target for London to manage as much of the waste it creates within its boundaries as is practicable by 2026. It gives responsibilities to boroughs for this through the use of apportionment targets for household and commercial and industrial waste. The apportionment is a mechanism to distribute the management of these waste streams arising in London between Boroughs. Tower Hamlets has been given an apportionment higher than the sum of waste predicted to arise in the Borough. In effect, this means the Borough would be handling waste that is being generated elsewhere in London. National Planning Practice Guidance advises that these apportionments are to be regarded as providing "high-level benchmarks" and so by implication are not fixed targets that must be achieved.

The borough's waste evidence base has identified and reviewed suitable sites from allocation of waste management uses in the Borough, having regard to national and regional policy. Screening and analysis determined that the following sites, safeguarded in the MDD were not deemed suitable for continued safeguarding for operational and deliverability reasons.

- Alisa Street (See 40 Gillender Street in Waste Management Evidence Base)
- Mc Grath (See Mc Grath, Hepscott Road in Waste Management Evidence Base)
- Fish Island Mid (See Unit 2 Stour Road in Waste Management Evidence Base)

Unit 6 Stour Road was discounted due to its size which was deemed to be unlikely to enable waste management facilities of sufficient capacity to be developed. In the case of McGrath, Hepscott Road, it was not considered suitable for continued safeguarding due to conflict with strategic policy. It is situated in a mixed use growth area and designated as a site allocation for employment, residential, creative and cultural uses and a linear park. It is also known that site operators are scaling down the operational activities of the site. With regards to 40 Gillender Street, the site no longer has an Environment Agency waste license and the site is one of ten sites located within the Poplar Riverside Housing Zone and contributes to the Borough's 15 year housing land supply.

The evidence base identifies two sites for continued safeguarding in table 1. These two sites are not sufficient to meet London Plan apportionment targets and as such steps (b to f) have been identified as measures to assist meet London Plan targets. Table 2 and 3 identify sites and areas suitable for management of waste capacity. Table 2 identifies sites that are not currently safeguarded but which are operational waste management facilities located in Tower Hamlets but falling within the control of the LLDC.

Tower Hamlets faces significant challenges in terms of managing high level of growth, particularly in Opportunity Areas as identified in the current London Plan and areas in transition as a result of the growth from outside the borough. The competing land pressures for continuing effective waste management in the borough becomes more and more important and urgent. These factors need to be appropriately balanced alongside the other challenges the borough faces in terms of rising land values, demand for land to meet London's housing needs, the resulting loss of industrial land, the high volume of traffic on our highways and the need to improve air quality. Consequently, the borough supports appropriate innovative solutions to the management of waste including appropriate co-location of uses and new technologies.

Policy Implementation

It should be noted that the LLDC area is the Local Planning Authority for eastern parts of Tower Hamlets Borough (Fish Island and part of Bromley-by-Bow) but are not the Waste Planning Authority for these areas. The LLDC Local Plan (2015) establishes policies for these areas. Any applications for planning permission in these areas should be submitted to the LLDC as the appropriate Local Planning Authority.

Part 1 seeks to ensure the waste management hierarchy is implemented by all development and at all stages in the development process. The waste management hierarchy is as below:

- Prevent
- Reduce
- Reuse and recycle / compost
- Recover
- Dispose

Part (1) a supports waste storage for three waste streams – recyclate, compostable and residual waste. Part (1) b refers to all stages of development: demolition, design, construction and operation.

Appropriate innovative solutions to managing waste may include bulking or recyclables, anaerobic digestors or vacuum systems.

Part (2) seeks to accord with London Plan (2015) Policy 5.17 and sets out the Council's approach towards seeking to meet London Plan requirements. A number of measures (1a to f) are outlined as a means to work towards these requirements and should be taken together. With regards to part 1 (c), development proposals for the change of use of safeguarded waste land to a non-waste use need to be agreed by all relevant parties as established in the London Plan and the LLDC Local Plan. For the purposes of Part 1(d) the capacity to be re-provided elsewhere on an alternative site will be determined using a calculation of the throughput based on an historical and practical understanding of the tonnages that have passed through the site and not the Environmental Agency permits, the practical site capacity or the planning permission thresholds

Part (3) relates to windfall applications for waste management facilities and / or applications for on-site management solutions. A criteria based response to the acceptability of an additional waste management facility will be applied with the appropriate siting of the facility being the first step towards determining the principle of the acceptability of the development. Such facilities would be directed towards allocated sites and areas of search as per part (1) of the policy in the first instance. Proposals that fall within these areas will receive in principle support but will also need to demonstrate that by virtue of their scale and nature the proposed capacity would not be out of character with the location in terms of design, amenity as well as the transport implications. Applications will be judged in accordance with the degree to which it satisfactorily meets all the criteria in this policy.

Policy ES 8 Waste Management in Development

1. *Development proposal should demonstrate how the waste hierarchy will be implemented. This will be achieved through requiring:*
 - a. *All proposals to demonstrate how it will provide appropriate storage facilities that enable the segregation of materials for residual waste, recycling and organic waste (where appropriate).*
 - b. *Proposals for Major development to submit a Waste Reduction and Management Strategy demonstrating how the waste hierarchy will be implemented during design, site preparation (including demolition where applicable), construction and lifetime operation of the development taking into account adverse impacts of the activities and proposing mitigation for these and the possible effects of cumulative development on the surrounding area*
2. *Development which incorporates capacity and/or facilitates for the storage, processing, collection and management of waste, will be supported where:*
 - a. *it implements the Waste Management Hierarchy and supports recycling and composting;*
 - b. *the design, scale and operation ensures compatibility with surrounding uses, does not compromise adjacent land uses, integrates well with the immediate surrounding and minimises conflicts between other users such as pedestrians, cyclists and vehicles;*
 - c. *the facility is located in an accessible location with adequate servicing arrangements;*
 - d. *transport impacts on the surrounding area are minimised including reduction of trips on the highway for servicing vehicles; and*
 - e. *adverse environmental and amenity impacts, including the emission of air pollutants, are mitigated to an acceptable level*

Justification

This policy aims to implement the strategic policy SP ES1. Where waste is poorly managed there can be negative consequence for the borough in terms of health and wellbeing, amenity, the environment and the transport network. In addition the management of waste imposes its own impacts which the policy is intended to reduce. These policies will ensure that negative impacts are minimised as much as is feasible.

Policy Implementation

Part (1) a seeks to ensure the segregation of waste streams is encouraged to support residents and businesses reduce and manage waste effectively. High density developments are encouraged to consider on-site separation systems, on site material processing systems and collection systems that are compatible with Council Services. that the separation of waste is into recycle, compostable materials (where appropriate) and residual waste streams within individual units and in flatted or multi-occupancy developments is supported and the storage of the subsequent materials is to be conducted wherever possible within the building footprint/envelope. Where this is not entirely possible arrangements should be made to ensure that the character and amenity of the development setting is not harmed and adverse impacts on the public realm or road safety are minimised.

Part (1) b sets out requirement for major development to be supported by a Long Term Waste Reduction & Management Strategy as a means to ensure that development manages waste effectively and in accordance with other relevant policies within the Local Plan. This Strategy should demonstrate a proportionate and locally relevant response to how the following aspects will be approached and achieved for the development and in relation to the provisions in the surrounding area.

- Minimise waste production during site preparation (including demolition where applicable), design, construction and operational phases;
- Quantify waste that is expected to be produced by occupants;
- Provision for appropriate and accessible storage and collection facilities for a minimum of three waste streams within individual units, and communal storage spaces, to facilitate management up the waste hierarchy;
- Implement an appropriate collection methodology that aligns with Council's requirements and best practice;
- Minimise the number of vehicle trips associated with waste requiring removal offsite;
- Account for cumulative impact and seek opportunities for collaborative management of waste storage and collection with other development in the vicinity;
- Application of innovative technologies and/or future proofing design for use of innovative technologies; and
- Promotion of the circular economy through, incorporating recycled materials into the design and fabric of developments and their surroundings/setting; processing waste arising from demolition onsite and utilisation of the resultant product where feasible; and, encouraging composting of organic waste produced and utilising the resultant product where feasible.

Part (2) relates to non-waste led development that proposes the management of waste onsite. This could be an anaerobic digester, macerators or compaction of recyclables. Applications will be judged in accordance with the degree to which it satisfactorily meets all the criteria in this policy.

9. Transport and Connectivity

Introduction

Tower Hamlets is already well connected and provided for in terms of public transport. Transport capacity will be further improved by the new Crossrail stations at Whitechapel and Canary Wharf. However, Tower Hamlets' population growth 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 existing transport network and impact on air quality.

In developing a Local Plan, we therefore need to manage growth and mitigate impacts to ensure travel demands of people and goods can be accommodated sustainably.

London Plan and Its Emerging Transport Strategy

The Mayor of London recognises that transport infrastructure has a vital part to play in supporting the capital's success and a providing a good quality of life. This requires careful and coordinated planning for transport services and physical infrastructure with the growth and development envisaged by the London Plan. The GLA's London Plan and the Mayor's Transport Strategy are currently under review. Once published for consultation, these policies and strategies will provide further guidance and inform preparation of this Local Plan.

East and South East London Sub-Regional Transport Plan

According to the GLA, London's population is projected to reach to 10 million by 2031, of which over 40% of the additional population will be expected within the identified Opportunity Areas of the east and south-east region of London. As a result, significant public transport improvements will be required to maximise the full development potential of these Opportunity Areas. Tower Hamlets comprises three London Plan Opportunity Areas and accommodating this growth will be one of the greatest challenges for the borough.

Despite potential transport schemes already in the pipeline, including the Silvertown Tunnel, the East and South East London Sub-Regional Transport Strategy concludes that additional public transport capacity will be required to accommodate the forecast growth.

Local Plan Transport Study

To ascertain whether the boroughs' projected growth can be supported by a sustainable transport network, the Council commissioned a borough Transport Study. The assessment includes the analysis of the current and committed provision of transport and its capacity to support the proposed housing and employment growth. It identifies appropriate mitigation measures that can be delivered as part of the planning process or as wider transport interventions. The assessment tests several options as shown in table 1⁷⁹ below.

Table. 1

Projection / Growth Scenario	Population (% change from 2015)	Employment (% change from 2015)
Central Growth (2031)	105,216 (37%)	54,503 (19%)
High Growth (2031)	116,386 (41%)	122,000 (42%)

The population numbers derive from the Council's housing 'Growth Model' and latest GLA employment forecasts for Tower Hamlets. The baseline analysis has indicated that even with committed mitigation measures such as Crossrail to address demand, transport modelling confirms

⁷⁹ LBTH Draft Transport Strategy (2016)

that future growth requires significant on-going investment in the strategic transport network⁸⁰, in particular in relation to public transport, walking and cycling. Much of this relates to the three Opportunity Areas of City Fringe, Lower Lea Valley, and Isle of Dogs and South Poplar, and is comparable significant in the latter area.

The assessment will identify a package of measures which require significant investment in public transport and active travel to facilitate sustainable delivery of the projected housing and employment growth. This would take the form of both infrastructure investment, and enhanced service provision but will also require wider operational strategies led by Transport for London (TfL) to promote and encourage sustainable travel.

The Council will work with partners to secure investment to existing and future strategic transport connections, including London Underground, rail, bus, and cycle and highway services. These enhancements will maximise the borough's regeneration potential and support growth whilst also helping to achieve our environmental objectives.

This section contains:

Strategic Policy TRN1 Sustainable Transport

Policy TRN2 Assessing the impacts on the transport network

Policy TRN3 Parking and car-free

Policy TRN4 Sustainable transportation of freight

Strategic Policy TRN1 Sustainable Travel

1. *The Council will promote a sustainable pattern of development in the borough by requiring:*
 - a. *developments generating a higher number of trips to be located in areas of the town centre hierarchy and/or areas with high levels of public transport accessibility and where public transport capacity can accommodate the proposed increase in trips;*
 - b. *developments to demonstrate they are properly integrated with the public transport network to maximise the offer to sustainable transport modes across the borough; and*
 - c. *ensure it has no unacceptable impacts on the capacity, quality, accessibility and safety of the public transport network or on any planned improvements and/or amendments to the public transport network*
2. *The Council will promote a sustainable pattern of development in the borough by ensuring development prioritises the needs of pedestrian, cyclist and access to public transport, including river transport, as the primary means of travel to and from the site*
3. *The Council will ensure the capacity, connectivity and quality of the public transport network meets the demands of current population needs and future growth, particular in the identified growth areas. This will be achieved by working with TfL and neighbouring boroughs to deliver strategic transport projects identified in the IDP*

Justification

Tower Hamlets is well connected in terms of sustainable transport. In most areas of the borough essential services such as retail, health and education facilities and employment opportunities are accessible via walking, cycling or public transport. However, the borough suffers from highway congestion, poor air quality and capacity constraints on the public transport network. Future population and development growth will exacerbate the existing capacity constraints. The delivery of a sustainable transport network is crucial and the policy provides a strategic objective to ensure

⁸⁰ LBTH Draft Transport Study (2016)

development is adequately located and integrated with the transport network and where required seeks to encourage a modal shift to sustainable transport and influence travel behaviours.

The borough has a low car ownership ratio with only 37% of households owning one car or more⁸¹. This correlates with the travel to work data that emphasises the reliance on public transport (60%) followed by 26% of residents walking or cycling. The level of journey to work by car, at 12% is lower than the average for London at 30%⁸². This presents an opportunity to further promote sustainable transport modes and reinforce a transport hierarchy that prioritises walking, cycling and public transport. This in turn will relieve congestion and improve the health and wellbeing of borough residents.

River transport is a growing mode of transport and could relieve the existing and future pressure on public transport network. River movement provides an opportunity to build upon TfL's significant investment into river bus movement for passengers with a target to increase movement to 12 million by 2020. TfL have proposed three new piers at Wapping, Canary Wharf East and Trinity Buoy Wharf which will also support river movement in the borough.

The Council is not directly responsible for the provision of public transport services but plays an important role in identifying and facilitating improvements in partnership with TfL. The associated growth impacts needs to be addressed beyond the borough boundary and requires partnership working with the Department for Transport, National Rail, TfL, and neighbouring boroughs to plan and jointly fund public transport improvements.

Policy Implementation

Part 1 requires development to be supported by a sustainable transport network by ensuring they are appropriately located to areas that are accessible and well connected. Locating such uses in these accessible locations will not only reduce the need to travel in the borough but also enable high trip generating uses to be accessible to more sustainable forms of transport.

The Council is not directly responsible for the provision of public transport services, but plays an important role in identifying and facilitating improvements in partnership with transport operators.

Part 1 seeks to ensure the capacity of the public transport networks meets current and future demand and to improve public transport in identified growth areas. In doing so, new development will need to demonstrate that it is integrated with the transport network and to contribute towards new transport infrastructure and improvements where necessary.

Part 2 promotes walking and cycling requires developments to secure an improved pedestrian environment that is safe, accessibility and permeable within the borough and into neighbouring boroughs. Improvements to the pedestrian environment should encourage walking as a primary means of travelling to and from the site by introducing appropriate measures that provide high quality and safe environment. Part 2 also requires a safe and accessible cycle environment and, where relevant, provides appropriate links to strategic cycle routes. The provision of cycle facilities is a crucial factor in encouraging more sustainable travel to and from the development. Part 2 seeks to ensure new development promotes river transport as a means of sustainable transport, where appropriate.

Part 3 seeks to improve and enhance transport and connectivity in the borough in partnership with other agencies. The Draft Transport Strategy identifies the interventions that are required to support the borough's public transport network. The list is not exhaustive and new interventions will arise from other transport strategies and assessment which new developments will also need consider.

⁸¹ LBTH Draft Transport Strategy (2016) – Census 2011

⁸² LBTH Draft Transport Strategy (2016) – Census 2011

Policy TRN2 Assessing the Impacts on the Transport Network

1. *The Council requires Transport Assessments or Transport Statements for major developments and developments that are likely to have a significant impact on the transport network to:
 - a. *demonstrate how impacts on traffic congestion within the Local and Strategic Road Network or/and public transport system are effectively mitigated; and*
 - b. *include the submission of a Travel Plan where significant transport impacts have been identified**
2. *The Council will require the delivery of transport infrastructure and/or improvement measures that mitigate directly related impacts from the development, and where these have been identified as necessary through the Transport Assessment*
3. *The Council will resist new development that results in an unacceptable adverse impact on traffic congestion within the Local and Strategic Road Network or/and public transport system unless it incorporates effective mitigation measures*

Justification

The Draft Transport Strategy confirms that there will be exceptionally high increase in the demand for public transport and highway congestion across the borough as a result of the proposed growth projections. This includes increased demand for trips from the borough to Central London and Stratford, as well as large increase in flows into the borough, in particular to Canary Wharf, from the east. There is currently overcrowding on the DLR, Jubilee and Central Lines during peak periods. This is anticipated to continue in the future despite the delivery of Crossrail. There are also a number of capacity constraints on parts of the existing strategic road network which will be further exacerbated by growth, creating significant delays, congestion and pollution in the borough.

To manage growth sustainably, Transport Assessments or Transport Statements will ensure that development proposals are adequately supported by a sufficient transport network and maximises the use of sustainable transport modes. A robust assessment is necessary to determine whether a development results in a significant increase in the number of trips to and from a site, is appropriate to the level of public transport accessibility, and where required identifies mitigation measures to address the impacts.

Securing and delivering mitigation measures is crucial to maximise the borough's regeneration potential and support growth whilst also helping to achieve environmental objectives. Without the necessary measures, the Council will not be meeting the national policy requirements of delivering sustainable development. In addition, it will not be possible to achieve the significant levels of housing and economic growth set out in the Local Plan without the supporting transport infrastructure required for people to travel to and from work, shops and leisure destinations.

Policy Implementation

Part 1 seeks independent, objective and accurate Transport Statements (TS) or Transport Assessments (TA) that are appropriate to the scale of development to accompany all major development proposals and any other development proposals which are considered likely to have significant transport impacts. Travel Plans may also be required to provide a long term strategy to meet sustainable transport objectives and should contain a package of measures that aid in minimising the number of trips taken by car, encourage use of sustainable transport and reduce the need to travel to and from the development. Travel Plans should set targets, objectives and detail how the Travel Plan will be implemented, funded and monitored

TA/TS and Travel Plans will need to be prepared in accordance with the most up-to-date guidance provided by TfL and the Council. The level of detail required will be dependent on the type and scale

of the development. TA/TS should 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. TA/TS should identify and address transport impacts associated with developments and set out the measures to avoid, remedy or mitigate identified impacts of the development.

TA should include a Construction Management and Logistics Plan (CLPs), and a Delivery and Servicing Plan (DSPs).

Part 2 seeks to ensure conditions are imposed and/or planning contributions used 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 Council's Regulation 123 List.

Policy TRN3 Parking and Permit-free

1. *Development will be required to comply with the parking standards set out in Appendix Two*
2. *Where development is located in areas of good public transport accessibility and/or areas of existing on-street parking stress the Council will require it to be permit-free*
3. *Development will be required to prioritise sustainable approaches to any off-street parking by ensuring an appropriate allocation of:*
 - a. *on-site car clubs and pool car schemes;*
 - b. *electric charging points and parking bays for electric vehicles; and*
 - c. *parking spaces for affordable family homes and accessible properties*
4. *Development will be required to provide adequate delivery and service within the site, encourage shared servicing arrangements and timing of deliveries.*
5. *In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, development will be required to:*
 - a. *meet, and preferably exceed, the minimum standards for cycle parking set out in Appendix Two; and*
 - b. *provide, where suitable, land for and/or contributions towards new publicly accessible shared cycle hire scheme docking station(s).*

Justification

Part of the Council's overall approach to sustainable travel patterns and addressing congestion is to control and manage the availability of parking - both on and off street. Minimising parking provision allows space for other uses and more efficient use of land, including housing, employment uses, community facilities, play areas, amenity spaces and cycle parking. In addition, minimising on-site parking provision within the borough can reduce car ownership and use and therefore lead to reductions in air pollution and congestion and improve the attractiveness of an area for local walking and cycling.

The Council does however also recognise that some people, businesses and organisations, rely on private car use as their only transport option.

A survey undertaken in June 2016⁸³ identified 25,355 on-street parking bays in the borough. The demand for parking exceeds the capacity with 29,643 permits issued to residents', which competes with parking vouchers issued to resident's visitors, pay-by-phone visitors and 4,500 resident blue

⁸³ LBTH Draft Transport Strategy (2016)

badge holders and those issued by other authorities. This is further exacerbated by non-permit parking which occurs overnight and during the weekend. The demand and capacity constraints lead to unacceptable levels of overcrowded on-street parking, and impacts highway safety.

The standards set out in Appendix Two are lower than those outlined in the London Plan. This is to better reflect the borough's unique local characteristics, relatively high levels of public transport accessibility, the level of parking stress and highway congestion within the borough in line with guidance set out by the NPPF. The parking standards have taken into account Public Transport Accessibility Levels (PTAL) as well as development of proposed family homes. Locations of highway congestion and on-street parking stress will also be taken into account when considering maximum parking levels.

Promoting sustainable approaches to any off-street parking through Car clubs' and 'pool car schemes' are cheaper alternatives to car ownership and will allow for occasional car use but discourage unnecessary car journeys. Also electric charging vehicles will assist with the reduction of poor air pollution in the borough.

The requirements for retail deliveries away from bulk supplies to stores to instead individual drop-offs to residential and employment locations are rising. Such deliveries are often large and have specialised movement and parking requirements. Where these are not accommodated on the site, these vehicles may be forced to park in the street, where there is limited space due to demands arising from private vehicle parking. Servicing on-street can result in highway obstruction, congestion, and safety, coupled with poor amenity and public realm. Therefore, the Council wishes to mitigate the impacts from servicing by requiring on-site arrangements.

Policy Implementation

Part 1 of the policy seeks an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. Car parking standards are set out in Appendix Two for the provision of parking for different types of development. Parking spaces should be well integrated within the development or public realm.

Disabled accessible parking bays should be a proportion of the overall parking provision, (as calculated using London Plan/Housing SPG guidance) and not added separately.

With regard to part 2 of the policy, areas of good public transport accessibility are considered to be of level 4 and above on the Public Transport Accessibility Level as per the London Plan (2011).

Parts (3)(a&b) of the policy provides guidance for sustainable approaches to off-street parking. A Car Parking Management Plan may be required in order to demonstrate operation and management of this parking as well as allocation of other off-street parking.

The Council recognises that residents in affordable housing do not always have a great degree of choice over where they live and this can be especially difficult for families accessing shops and services. Part (3c) of the policy seeks to assign a proportion of off-street parking spaces provided within a new development, to be specifically allocated to affordable family homes. The Council will require a proportionate allocation of spaces to be made to affordable family homes and the operation and allocation of these spaces will need to be agreed with the relevant registered provider.

Part 4 requires development to provide on-site delivery/service vehicles to visit the site and should be integrated into the development at the early design formulation stages to ensure provision does not cause obstruction to the public highway. If on-site delivery/service cannot be accommodated, it must be clearly demonstrated with adequate justification. Where, servicing is to be undertaken on street, it must be demonstrated that it would not lead to obstruction of traffic including buses, or lead to adverse safety implications for vehicles and/or pedestrians.

Part 5 of the policy also seeks to ensure that a sufficient amount of cycle parking should be provided to accommodate current demand and to encourage further use over time. They should be designed and located to be fully accessible, secure, undercover (where possible) and convenient to use. This includes having access to shared cycle-hire schemes and associated facilities such as showers and changing rooms.

Policy TRN4 Sustainable Transportation of Freight

1. Development that generates a significant number of vehicle trips for goods or materials during its construction and operational phases will need to demonstrate how:
 - a. the impacts on the transport network and on amenity will be avoided, remedied or mitigated through Transport Assessments, Construction Management and Logistics Plans, Travel 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, the use of low emission vehicles, electric vehicles, bicycles and freight consolidation facilities has been prioritised; and
 - d. goods vehicles are accommodated on site.
2. Development adjacent to protected wharfs and rail depots will need to ensure it does not prejudice their operation.
3. The provision of new wharfs or other facilities for freight transfer, or passenger interchange, between road, rail or water, will be supported where these minimise impacts on the environment and neighbouring amenity.

Justification

The movement of goods and materials by road can have a significant impact on the environment and the health and wellbeing of residents, in terms of noise disturbance and its contribution to road congestion and air pollution. The continued growth of London is expected to result in a 15% increase in demand for freight and servicing by 2025.⁸⁴

The borough is experiencing increasing delivery vehicles on the road network resulting from traditional servicing coupled with home and office deliveries from on-line retail. Vehicles involved in freight are typically some of the most polluting vehicles on our roads. As Tower Hamlets grows, demand for freight is likely to increase. The flexibility that road freight offers means that this will remain the most commonly used means of transporting freight for some time.

The Council will need to facilitate the safe, reliable and efficient movement of freight and servicing trips. This will be achieved through appropriate off-street arrangements within a development to maximise operational efficiency and mitigate the effects of freight, delivery and servicing activity on the road network. Further to this, a modal shift to sustainable modes of transport will support the use of freight consolidation centres, rail and water for large scale developments and the use of low carbon and zero emission vehicles for local deliveries.

Policy Implementation

Part 1 requires development that generates a significant number of vehicle trips for goods or materials to be assessed according to its likely impact and with reference to the most up to date guidance set out in the TfL's London Freight Plan (2007).

⁸⁴ (TfL 2013).

The Council recognises that the promotion of sustainable freight transport needs to acknowledge and mitigate any potential negative impact on the surrounding environment and road and public transport networks. To enable this, development needs to demonstrate that transport of its construction and operational material and waste is carried out in a sustainable manner.

Part 1 seeks to provide adequate services arrangements within the site and to facilitate the safe, reliable and efficient movement of freight and servicing trips to, in balance with the needs of other transport users.

Setting up freight consolidation centres can help to reduce the number of vehicle trips on the network and should be considered where feasible. Freight consolidation centres are distribution warehouses, situated close to town centres or construction sites, at which part loads are consolidated and delivered to the target area resulting in fewer lorry journeys.

The operations of protected wharfs and rail depots are sensitive to their surrounding uses. As such, part 2 and 3 requires adjacent development to recognise their role without negatively impacting on their functions. Conversely, new wharves or other freight transport facilities may also have an impact on adjacent uses which need to be addressed and minimised.

10. Developer contributions

Introduction

In order to ensure that the policies of this document can be effectively put into action and that sites in the borough (particularly those key sites identified in Chapter Five) are developed and delivered according to the Council's spatial vision and strategic objectives, the Council will continue to undertake regular monitoring and adopt the following implementation approaches.

The Council's proposed vision and objectives put emphasis on the importance to manage growth and shape changes through planning for infrastructure which could be secured timely to meet current and future requirements of our community. Given the projected population growth in the borough, planning for infrastructure is at the heart of the Local Plan. The Local Plan will be implemented by using planning contributions, working with strategic partners and the local community and committing to monitoring the progress made year by year. The Local Plan will ensure that new development in the borough contributes towards the provision of infrastructure needed to support growth and secure benefit for the borough's communities, as well as mitigating development impacts.

This section includes those policies which specifically apply to developer contributions.

Policy DC1 Planning Contributions

DC1 Planning Contributions

1. *Applicants proposing new development may be required to:*
 - a. *Enter into Section 106 (S106) agreements to make provisions to mitigate the impacts of the development where necessary or appropriate, having regard to any relevant supplementary planning documents or guidance; and*
 - b. *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 CIL.*
 - c. *Where proposals do not meet planning policy requirements or do not propose to deliver required S106 planning obligations, applicants will be required to submit Financial Viability Assessments to the Council who may appoint experts, at the cost of the applicant, to consider submissions made.*
2. *For development scheme of 10 units or more, or with a combined gross floorspace of 1,000 sqm (gross internal area) or more, that involves an existing vacant building either converting or being redeveloped, no vacant building credit will be applicable.*

Justification

Planning obligations can help to contribute to the success of a development and achieve the Council's aims for a site, its local area and the borough as a whole. They can enhance the quality of a development and ensure it does not give rise to unacceptable planning impacts.

Part (1a) seeks to address site specific impacts through planning obligations where these cannot be addressed through Community Infrastructure Levy (CIL). Part (1b) seeks to apply the CIL Charging Schedules both at borough and London levels. CIL is a new mechanism that allows local authorities in England and Wales to levy a charge on new developments in their area in order to support the delivery of infrastructure. CIL receipts can be used to support growth, by helping to pay for a wide range of infrastructure, which could include parks, schools, community facilities, health facilities, leisure centres etc. In Tower Hamlets, Charges are set out in the Council's Charging Schedule and may vary according to geographical area, scale and use.

Part (1c) aims to ensure developments in certain scale and nature positively contribute to Council's aims for a site, its local area and the borough as a whole.

Part (2) sets out the Council's approach to planning applications in respect of the vacant building credits, which states the floorspace of any vacant building which is demolished or brought back into use, excepting when the building has been abandoned, should be discounted when calculating affordable housing contributions.

Policy Implementation

The key principles for establishing a Planning Obligation are defined in the National Planning Policy Framework (NPPF) which states that Planning Obligations should only be used where they are:

- necessary to make the proposed development acceptable in planning terms
- directly related to the proposed development; and
- fairly and reasonable in scale and kind to the proposed development.

The Council's Planning Obligations Supplementary Planning Document (SPD) provides detailed guidance on its 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 to this document correctly.

To implement part (1b), development must follow both the Tower Hamlets CIL Charging Schedule (2015) and the Mayor of London's CIL Charging Schedule (2012). For applications permitted under the LBTH CIL, Section 106 financial, non-financial and site specific obligations still exist but in a more limited way, related more closely to the site of the development and matters that are not classed as infrastructure for CIL purposes. Section 106 agreements will still be used to secure affordable housing on new developments as well as other necessary Section 106 financial and non-financial.

Tower Hamlets Council will work collaboratively with its partners to seek to deliver the infrastructure necessary to support the growth and development identified within this Plan and the contribution that this growth can make to achieve the objectives of this Plan and the other Council's strategies. The Infrastructure Delivery Plan (IDP) includes the identified necessary infrastructure types. A summary of the infrastructure projects is included in Appendix Six. The IDP will be reviewed and, where necessary, updated annually in consultation with both internal and external stakeholders such as the Council's Services and infrastructure providers.

To avoid double-dipping, the Council has published a Regulation 123 List alongside the CIL Charging Schedule, which sets out the projects or types of infrastructure the Council intends will, or may, be wholly or partly funded by the Community Infrastructure Levy (CIL).

To implement Part (1c), development should apply the Council's Viability SPD. This document will provide guidance as to 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.

Financial viability is a key consideration in terms of the application of S106 planning obligations and where proposals do not meet planning policy or propose to provide required planning obligations; Financial Viability Assessments are required to be submitted in accordance with the Council's prevailing Local Validation Requirements Checklist or any relevant SPD.

At the earliest opportunity the issue of financial viability should be considered. If an applicant is engaged with the Council in this regard prior to the submission of a planning application then the chances of a positive outcome for all sides are greatly increased.

CHAPTER FIVE: DELIVERING PLACE MAKING